Case 15-42460 Doc 32-2 Filed 11/12/15 Entered 11/12/15 16:37:15 Desc Exhibit (B) dra Page Brow 18

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1	UNITED STATES BANKRUPTCY COURT	1	On Behalf of the Debtor:	
2	DISTRICT OF MINNESOTA	2		
3		3	BARBARA J. MAY, ESQ.	
4	In re: Chapter 13	4	Attorney at Law	
5	Case No. 15-42460 (KHS)	5	2780 Snelling Avenue North	
6	Paul Robert Hansmeier,	6	Suite 102	
7		7	Roseville, Minnesota 55113	
8	Debtor.	8	651.486.8887	
9		9	barbarajmay@hotmail.com	
10		10		
11		11		
12		12		
13	DEPOSITION OF PADRAIGIN BROWNE	13	ALSO PRESENT: Paul Robert Hansmeier	
14	Taken October 28, 2015	14		
15	Commencing at 9:35 a.m.	15		
16		16		
17		17		
18		18		
19		19		
20		20		
21		21		
22		22	NOTE: The original transcript will be delivered to	
23	DEDODED DV KELLEY D GILLEG DDD	23	Edward P. Sheu, Esq., as the taking party of the	
24	REPORTED BY: KELLEY E. ZILLES, RPR	24	deposition.	
25	www.paradigmreporting.com	25		
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1	Deposition of PADRAIGIN BROWNE, taken on the 28th	1	INDEX	
2	day of October 2015, commencing at 9:35 a.m., at the law firm of Best & Flanagan, LLP, 60 South Sixth Street,	2		
3	Suite 2700, Minneapolis, Minnesota, before Kelley E.	3	WITNESS: PADRAIGIN BROWNE PAGE	
4 5	Zilles, Registered Professional Reporter and a Notary	5	WITNESS. TABLATOTIV BROWNE	
6	Public of and for the State of Minnesota.	6		
7	******	7		
8		8	EXAMINATION BY MR. SHEU	
9	APPEARANCES	9		
10		10		
11	On Behalf of the Judgment Creditors:	11		
12		12		
13	EDWARD P. SHEU, ESQ.	13	BROWNE EXHIBITS MARKED AND REFERRED TO:	
14	Best & Flanagan, LLP	14		
15	60 South Sixth Street, Suite 2700	15	Exhibit 1 Notice of Issuance of Subpoenas For	
16	Minneapolis, Minnesota 55402	16	Rule 2004 Examinations 7	
17	612.339.7121	17		
18	esheu@bestlaw.com	18	Exhibit 2 Form 8879 IRS e-file Signature	
19		19	Authorization	
20	On Behalf of the Creditor Alan Cooper:	20		
21		21	Exhibit 3 1040 U.S. Individual Income Tax	
22	PAUL GODFREAD, ESQ.	22	Return 2013 19	
23	Godfread Law Firm	23		
24	612.284.7325	24	Exhibit 4 1040 U.S. Individual Income Tax	
25	paul@godfreadlaw.com	25	Return 2014 19	

800-545-9668 612-339-0545

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1	Exhibit 5 Supplemental Documentation in Support	1	Q. Okay. Any medications that might affect your	
2	of Smith's Motion for Reconsideration	2	ability to give truthful testimony today?	
3	(ECF No. 189)	3	A. No.	
4		4	Q. Do you agree to give truthful testimony today?	
5	Exhibit 6 Copies of Checks Front and Back and	5	A. Yes.	
6	Chase Bank Statements 44	6	Q. Okay. First I'm going to have the court	
7		7	reporter mark this as Exhibit 1.	
8	Exhibit 7 Box of Documents Produced 53	8	(Browne Deposition Exhibit Number 1	
9		9	marked for identification.)	
10	Exhibit 8 The Mill Trust	10	Q. Now I'm handing you what's been marked	
11		11	Exhibit 1. You're here today because of a subpoena, is	
12	(Original exhibits attached to original transcript.	12	that correct?	
13	Copies attached to transcript copies.)	13	A. Yes.	
14		14	Q. Okay. Could I have you take a look at	
			Exhibit 1. Is this the subpoena that you've been served	
15		15	with and the reason you're here?	
16		16	A. I believe so, yes.	
17		17	Q. Okay. Now if you turn to the page in Exhibit 1	
18		18	that refers to your reason for being here.	
19		19	A. Do you know what page it is?	
20		20		
21		21	Q. If you flip to the subpoena that begins with	
22		22	your name, do you see it?	
23		23	A. Yes.	
24		24	Q. Okay. Now at the end of the subpoena there's a	
25		25	series of requests for documents, it says, "Documents	
	Page 6		Page 8	
1	PADRAIGIN BROWNE,	1	requested," and there's several categories, there's 25	
2	duly sworn, was examined and testified as follows:	2	numbered paragraphs, do you see that?	
3	EXAMINATION	3	A. Yes.	
4	BY MR. SHEU:	4	Q. Did you provide those documents to me today?	
5	Q. Could you please state and spell your full name	5	A. I believe so.	
6	for the record.	6	Q. Okay. Is that the box that is sitting on the	
7	A. Padraigin Browne, P-A-D-R-A-I-G-I-N, Browne,	7	table here?	
8	B-R-O-W-N-E.	8	A. Yes.	
9	Q. Ms. Browne, have you ever had your deposition	9	Q. Okay. So going through them you first provided	
10	taken before?	10	your tax returns for the past six years?	
11	A. I have not.	11	A. I did not have 2009, but the rest of them, yes.	
12	Q. Have you ever given sworn testimony of any other	12	Q. Okay. Regarding No. 2, transfers to you, did	
13	kind?	13	you provide all documents showing any distributions,	
14	A. I have not.	14	payments, et cetera, of any kind to you from the debtor?	
15	Q. Okay. I'm just going to give you a few ground	15	A. Yes.	
16	rules for this. I'd ask that you let me finish asking a	16	Q. And No. 3, did you provide any documents showing	
17	question before beginning to answer so that we don't	17	your receipt of any money by any company by which the	
18	create a fuzzy record. And I'll try to do the same when	18	debtor has had an interest in the past six years?	
19	you're answering, not interrupt you. I'll ask that if	19	A. Yes.	
20	you don't understand a question that you let me know	20	Q. No. 4, I won't read them, can you just let me	
21	otherwise I'm going to assume that you understood the	21	know if you provided all documents requested in No. 4?	
22	question. Are you under any physical or mental	22	A. What I had, yes.	
23	impairments that could affect your ability to give	23	Q. Okay. What did you do, by the way, to retrieve	
24	truthful testimony today?	24	the documents requested in the subpoena?	
1	A. No.	25	A. I went to the banks, my banks, either accessed	
25			· · · · · · · · · · · · · · · · · · ·	

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1	online or if there was no longer online access I went to	1	Q. Is that a yes?
2	the actual bank and requested the information.	2	A. Right, I have no accountant.
3	Q. And which banks did you either go online for or	3	Q. Does the family have an accountant that it's
4	go physically and request?	4	ever used in the past six years?
5	A. Sallie Mae, Capital One 360, Associated Bank	5	A. We did use in the past.
6	online, and TCF in person.	6	Q. Who was that?
7	Q. Okay. Going back through No. 5, did you provide	7	A. Jackie Borster did our taxes.
8	the documents requested in No. 5 of the subpoena?	8	Q. Do you remember for what years?
9	A. Yes.	9	A. 2011 and 2012 I believe.
10	Q. How about No. 6?	10	Q. Could you spell Borster?
11	A. Yes.	11	A. B, it's either Boyster or Borster, it's
12	Q. And No. 7?	12	B-O-R-S-T-E-R I believe.
13	A. Yes.	13	Q. And is that person local?
14	Q. No. 8?	14	A. She is.
15	A. Yes.	15	Q. Do you happen to have her contact information?
16	Q. No. 9?	16	MS. MAY: I presume it shows on the taxes,
17	A. Yes.	17	doesn't it?
18	O. No. 10?	18	A. Yes, she signed for us those years and her
19	A. Yes.	19	information is on the tax returns for those years.
20	Q. 11?	20	MS. MAY: It's required by federal law.
	A. Yes.		Q. No. 21, insurance?
21	0. 12?	21	A. I don't think I gave you my health insurance
22	A. Yes.	22	number, but I can give you the health insurance card.
23	0. 13?	23	
24	~	24	Everything else, yes.
25	A. Yes.	25	Q. That's fine. Life and disability?
	Page 10		Page 12
1	Q. 14?	1	A. Yes, that's in there.
2	A. Yes.	2	Q. No. 22?
3	Q. 15?	3	A. Yes.
4	A. Yes.	4	Q. Were there any loans between you and the debtor?
5	Q. 16?	5	A. No.
6	A. Yes.	6	Q. How about any gifts?
7	Q. 17?	7	A. I'm not sure how, I mean, he's obviously given
8	A. Yes.	8	me birthday presents, Christmas gifts, et cetera, over
9	Q. 18?	9	the last six years.
10	A. Yes.	10	Q. How about money gifts?
11	Q. 19?	11	A. He helped me pay off my student loans in 2011.
12	A. Yes.	12	Q. Any other gifts of money?
13	Q. What software do you use?	13	A. No.
14	A. None.	14	Q. How about No. 23?
15	Q. Okay. So some of your answers, when you say	15	A. Yes.
16	yes, do you mean	16	Q. So were there any transfers of any documents
17	A. As in if I have it, I provided it; and if I	17	that you provided today showing transfers of money from
18	don't, I didn't.	18	the debtor to you in the past six years?
19	Q. Okay. No. 20?	19	A. Well, the bank account statements show all of
20	A. Yes.	20	the money that is coming in and out, so.
21	Q. As in provided or don't have?	21	Q. Were there any transfers of money from the
22	A. I don't, I don't believe that we have, we don't	22	debtor to you in the past six years?
23	have an accountant.	23	A. Yes, before we got married he would write me a
24	Q. No accountant?	24	check and then I would write the check for our rent.
25	A. Right.	25	Q. When did you get married?
		اتا	·

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1	A. 2011.	1	there any other expenses that are associated with your
2	Q. So since 2011 there's been no transfers of money	2	property?
3	from the debtor to you?	3	A. Electric bill.
4	A. Not of any significant amount that I remember.	4	Q. Utility bills?
5	Q. How about No. 24?	5	A. Yes.
6	A. Yes, again, bank accounts.	6	Q. Anything else?
7	Q. And then 25 is real estate, did you provide any	7	A. Not that I can think of, no.
8	documents relating to your real estate?	8	Q. Do you know what the current mortgage loan
9	A. No, we just moved and I can't find everything,	9	balance is right now?
10	but it's on public record.	10	A. I think it just went under 600. Obviously not
11	Q. All documents relating to your	11	\$600, \$600,000.
12	A. It should be, I believe it should be on Hennepin	12	Q. When did you purchase the property?
13	County property Web site.	13	A. I think we signed in March 15, 2013, I'm not
14	Q. Well, your mortgage wouldn't be. Your deed	14	positive on the date.
15	would be.	15	Q. So about two, two and a half years ago?
16	A. Right. Well, with respect to the mortgage, I	16	A. Yeah.
17	had to pay it and I don't keep the stubs after I pay it,	17	Q. How much did you buy it for?
18	so I don't have a current copy of how much we owe.	18	A. 775, so \$775,000.
19	Q. Do you	19	Q. Let me have you turn a few pages in Exhibit 1 to
20	A. And online they don't have, they do not have a	20	the subpoena directed to Monyet or Monyet, M-O-N-Y-E-T,
21	printable thing for our mortgage.	21	LLC, do you see this?
22	Q. Who's the mortgage company?	22	A. I do.
23	A. TCF Bank.	23	Q. Are you appearing on behalf of Monyet?
24	Q. What is the monthly mortgage payment?	24	A. I am not.
25	A. Including taxes it's \$4,600, give or take.	25	Q. Okay. How do you pronounce it, is it Monyet or
	Page 14		Page 16
1	There's some cents involved in that, but approximately.	1	Monyet?
2	Q. And does insurance, do you have to pay real	2	A. I don't know.
3	estate insurance or property insurance?	3	Q. Okay. Have you ever heard of Monyet or Monyet?
4	A. Do you mean like	4	A. Yes, I have.
5	Q. Like hazard insurance for the property?	5	Q. Okay. What is it?
6	A. Yes, we have insurance through State Farm.	6	A. It's an LLC.
7	Q. Is that a separate bill?	7	Q. Okay. Other than being an LLC, do you know
8	A. Yes.	8	anything about Monyet or Monyet, LLC?
9	Q. And then you have	9	A. It was a company that's part of our trust and
10	A. I think.	10	estate planning.
11	Q. And then you have CIC fees?	11	Q. By our, you mean you and the debtor?
12	A. I have no idea what that means.	12	A. Yes, our family.
13	Q. Condo fees, common interest community fees?	13	Q. Okay. So what was the origin of it, who set it
14	A. Yes, and that is in there, in the box.	14	up?
15	Q. In the box you provided today?	15	A. A trust and estate attorney.
16	A. Yes.	16	Q. At your direction?
17	Q. Who's the management company?	17	A. It was probably at our, both of ours, it's our
18	A. It used to be, it used to be Gittleman and they	18	trust and estate planning.
19	changed their name. I think it's First Service	19	Q. Okay. Is it associated with the Mill Trust,
20	Residential now, I'm not positive.	20	M-I-L-L, trust?
21	Q. And do you know what the monthly fees are?	21	A. It is.
22	A. Approximately \$860 a month.	22	Q. Okay. Is the Mill Trust actually your family
23	Q. And other than your mortgage payment which	23	trust?
24	includes real estate taxes, other than State Farm	24	A. Yes.
25	Insurance payments, other than the management fees, are	25	Q. Okay. And your family is you and the debtor and
	D 1' D		0.00.00

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1	your two children, is that correct?	1	A. I don't believe so.
2	A. That's correct.	2	Q. Where was the account?
3	Q. Okay. And when was that trust set up?	3	A. Scottrade I think.
4	A. I think 2011, I think, I'm not sure.	4	Q. Scottrade?
5	Q. And are there any documents associated with the	5	A. I think.
6	creation of that trust such as a trust instrument?	6	Q. Is that an online broker?
7	A. Yes.	7	A. Yes.
8	Q. Did you provide them today with the box of	8	Q. So was the money in stocks as opposed to cash?
9	documents?	9	A. I don't know.
10	A. I believe so.	10	Q. I'm sorry?
11	Q. So the trust document itself is in there?	11	A. I don't know.
12	A. I think so, yes.	12	Q. Who would know most about Monyet and the Mill
13	Q. Okay. I just looked through it, I didn't find	13	Trust?
14	it.	14	A. Paul was the manager of the, of Monyet.
15	THE WITNESS: Paul?	15	Q. You were the trustee, weren't you?
16	Q. You don't know if it was provided or not?	16	A. I was the trustee of the Mill Trust.
17	A. No. I thought it was in there, but if it's not,	17	Q. And as trustee of the Mill Trust, what were your
18	then it's not.	18	obligations or duties?
19	Q. Okay. Is the Mill Trust still in existence	19	A. I was in charge of using the money as I saw fit
20	today?	20	for our family.
21	A. I don't know how to answer that. I guess so,	21	MR. SHEU: I'm going to have a few more
22	yes.	22	exhibits marked.
23	Q. And what is the purpose of the trust?	23	(Browne Deposition Exhibit Numbers 2 - 4
24	A. To provide for our family expenses.	24	marked for identification.)
25	Q. How is it funded?	25	Q. Ms. Browne, I'm handing you what's been marked
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1	A. Through transfers from Paul and from his	1	Exhibits 2, 3 and 4. I'll indicate to you that these
2	companies.	2	were provided by your attorney a few weeks ago.
3	Q. How much is in it now?	3	MS. MAY: I'm uncomfortable not seeing the
4	A. Approximately \$8,000.	4	documents my client is seeing.
5	Q. What was the high water mark?	5	MR. SHEU: I will share them with you.
6	A. I don't know.	6	Q. Do you see Exhibits 2, 3 and 4?
7	Q. Did you ever have access to the account	7	A. Yes.
8	statements for that trust?	8	Q. Are these, and you can take a look through them,
9	A. Yes.	9	are these your 2012, 2013 and 2014 income tax returns?
10	Q. Was Monyet the, the funding LLC for the trust?	10	A. That's what they appear to be.
11	A. I don't know what that means.	11	Q. Okay. I'll have you first look at 2012 which is
12	Q. Well, a trust itself I presume doesn't have its	12	Exhibit 2. The second page of it appears to be a W-2
13	own bank account, is that your understanding?	13	from your employer Shumaker & Sieffert, is that correct?
14	A. I just did what the attorney said to do and I	14	A. Yes, that's what it looks like.
15	didn't, I don't know how any of it works.	15	Q. What is your income at Shumaker & Sieffert?
16	Q. What attorney are you talking about?	16	A. I get paid a percentage of the amount I bill.
17	A. The attorney that set up the trust.	17	Q. Are you a partner or an associate?
18	Q. Who's that?	18	A. I'm not, I'm an associate.
19	A. I don't remember his name. He's out of Utah.	19	Q. Okay. What was your income in 2012?
20	Q. Was it Lee McCullough?	20	A. It appears that it was 55,000 for state and 62
21	A. That sounds familiar.	21	for federal, with respect to Social Security it was
22	Q. Did you ever have access to the account	22	62,000.
23	statements for Monyet or Monyet, LLC?	23	Q. When did you begin working at Shumaker &
24	A. Yes.	24	Sieffert?
25	Q. Were you a signatory on that account?	25	A. 2011.
	· · · · · · · · · · · · · · · · · · ·	1	

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1	Q. Do you remember what your income was in 2011	1	each other.
2	roughly?	2	A. Sorry.
3	A. No.	3	Q. You have no idea what Big Sky Films, LLC is?
4	Q. Do you believe it was comparable to 2012?	4	A. That's correct.
5	A. No, I believe it was more.	5	O. Who would know?
6	Q. Was there some reason in 2012 it was lower than	6	A. Paul.
7	2011?	7	O. The debtor?
8	A. Yeah, I took five months of maternity leave.	8	A. Yes.
	Q. Understandable. Do you know what your income is		Q. Would the debtor also know more about Monyet,
9	going to be for 2015?	9	LLC and the Mill Trust than yourself?
10	A. No.	10	A. I don't know.
11		11	
12	Q. Do you know how much you've been paid to date?	12	Q. Now you realize that the debtor testified in his
13	A. No.	13	debtor's exam a year ago that you would know more than
14	Q. You have no idea how much you've been paid?	14	him about Monyet, LLC?
15	A. No, I don't look at my W-2.	15	A. No.
16	Q. You don't look at your paychecks?	16	Q. You didn't know that?
17	A. No.	17	A. I did not.
18	Q. You have no idea how much money you make, is	18	Q. Was that not an accurate statement?
19	that what you're telling me?	19	A. I have no idea.
20	A. No, that's correct, I don't know how much I	20	Q. So who knows more about Monyet and the Mill
21	make.	21	Trust, you or the debtor?
22	Q. I'm going to have you flip ahead in Exhibit 2 to	22	A. I don't know.
23	schedule E. Under part 2 of Exhibit	23	Q. I'll have you turn to Exhibit 3 which is the
24	A. I'm not there yet.	24	next document. Is this your 2013 tax return?
25	Q. Excuse me.	25	A. It appears to be.
	Page 22		Page 24
1	A. Did I miss it? I'm sorry, I don't, I don't know	1	Q. And what was your income in 2013?
	where it is.	2	A. I don't know.
2	Q. If you hand it back to me I'll find it. I've		
3		3	Q. Do you have any idea from looking at your 2013 tax return?
4	turned the page in Exhibit 2 to what's the beginning of	4	
5	schedule E of your 2012 tax return. I see three	5	A. It looks like it was 85 something.
6	entities there, do you see that, Steele Hansmeier, PLLC,	6	Q. 85,000 something?
7	Under the Bridge, and Big Sky Films, LLC?	7	A. Yeah.
8	A. Yes.	8	Q. What's the most you've ever made as an attorney
9	Q. Are you familiar with any of those entities?	9	in a year?
10	A. No.	10	A. I don't know.
11	Q. You know nothing about them?	11	Q. Is it more than \$100,000?
12	A. All I know is that they are somehow related to	12	A. Yes.
13	Paul.	13	Q. Is it more than \$150,000?
14	Q. You don't know anything beyond that?	14	A. I don't think so, I don't know.
15	A. I know Steele Hansmeier was a law firm.	15	Q. What was the starting salary at Shumaker &
16	Q. What do you know about Under the Bridge?	16	Sieffert when you began working there?
17	A. Nothing.	17	A. As I said, I get paid a percentage of what I
18	Q. Nothing at all?	18	bill.
19	A. That's correct.	19	Q. I'll have you turn to schedule B of Exhibit 3
20	Q. It appears on your tax return and you have no	20	which is the beginning of the interest and ordinary
21	idea what it is?	21	dividends. It's on Page 4 of the Exhibit 3.
22	A. That's correct.	22	A. Okay. Here, okay.
23	Q. Same with Big Sky Films, LLC	23	Q. Now do you see under part 2 of schedule B
24	A. That's correct.	24	Scottrade, Inc.?
	Q. Excuse me, we have to make sure not to talk over		A. Yes.
25	2. Enouge me, we have so make pure not to tark over	25	11. 150.

Dage 25 Q. Is that the Scottrade we were taiking about that Scottrade? A. I don't know, Q. You don't know anything about this Scottrade? A. There's two Scottrades listed. Q. Other than the 401(8)? A. I have a Scottrade listed. Q. Other than the 401(8)? A. I have a scottrade is a company and I know that the scottrade? A. I have a process and the scottrade is a company and I know that the scottrade is a compa			10/28	/20	Page: 7
2 earlier associated with Monyet, LLC? 3 A. I don't know. 4 O. You don't know anything shout this Scottrode? 5 A. There's two Scottrodes listed. 6 C. Okay. Do you know anything shout ithis Scottrode? 7 there? 8 A. I know Scottrode is a company and I know that the paid us dividends. 9 they paid us dividends. 10 O. What did they pay you dividends for? 11 A. I don't know. 12 O. You don't know why you were being paid money trom Scottrade? 13 A. No. 14 A. No. 15 O. Did you set up any Scottrade account? 16 A. I have a personal Scottrade account? 17 O. To that one of these listed? 18 A. I dan't know. 19 O. To you know which one it is, the smaller number or the bigger mamber? 19 O. To you know which one it is, the smaller number or the bigger mamber? 20 A. Whe moory I make. 21 O. Fore working? 22 A. Whe moory I make a scott deposit from your job at 2 Shomaker a disferet? 23 A. Take scorteet. 24 O. Where does it go? 25 A. A scotted Bank. 26 O. Where does it go? 27 A. Take's correct. 28 O. More scotted Bank. 29 O. Do you have a direct deposit from your job at 2 Shomaker a disferet? 30 A. Take scorteet. 31 A. I do. 32 O. Do you know what that's about? 33 O. Now much of that was earned by you as opposed to 10 foors Stak you'll see a reference to long-term stocks, de 10 in the stack market, I don't remember the 20 in you see that? 20 A. When won't provide account? 21 A. I do. 32 O. Do you have a direct deposit from your job at 2 Shomaker a disferet? 33 A. I do. 44 D. Where does it go? 45 A. A scottage Bank. 46 O. Where does it go? 47 Or make transfers to, for ceasurpis, Scottrade? 48 A. That's correct. 49 O. Whe much of that was earned by you as opposed to 10 foors Stak you'll see a reference to long-term stocks, de 10 in the stock of the deposit from you in the stock of the definition of that the account? 29 O. Do you know what that's about? 20 O. Do you know what that's about? 21 A. I do. 32 O. Where the deposit from you can write checks de 20 or firm? 34 A. That's correct. 45 O. Oke when we a fire of deposit from you can			Page 25		Page 27
A. I don't know. Q. You don't Mnow anything about this Scottrade? A. There's two Scottrades listed. A. I know sectorade size of these counts of the state of these counts of the state o	1	Q.	Is that the Scottrade we were talking about	1	A. I have a 401(k).
Q. You don't know anything about this Scottrade? A. Three's two Rechtrades Isted. O. Oxay. Do you know anything about either of them? A. I know Scottrade is a company and I know that they paid us dividende. C. What did they pay you dividende for? A. I don't know. C. What did they pay you dividende for? A. I don't know. C. You don't know why you were being paid money Erms Scottrade? A. I don't know why you were being paid money Erms Scottrade? A. I don't know why you were being paid money Erms Scottrade? A. I don't know whith the 95,000 in Drocker data that you received? A. I don't know. C. It looks like it was sold on July 1, 2013 and you renorived 395,644? A. I don't know. C. It looks like it was sold on July 1, 2013 and you renorived 395,644? A. I don't know. C. It looks like it was sold on July 1, 2013 and you renorived 395,644? A. I believe it's the smaller number. C. What wond you show which one it is, the smaller number. C. How do you fund your Scottrade account? C. How working? A. The live you find your Scottrade account? C. How working? A. I believe it's the smaller number. C. How you have a divort deposit from your joo at C. Do you know a divort deposit from your joo at C. Do you have a divort deposit from your joo at C. Do you have a divort deposit from your joo at C. Do you have a divort deposit from your joo at C. Do you have a divort deposit from your joo at C. Do you have a divort deposit from your joo at C. Do you have a divort deposit from your joo at C. Do you have a divort deposit from your joo at C. Do you have a divort deposit from your joo at C. Do you have a divort deposit from your joo at C. Do you have a divort deposit from your joo at C. Do you have a divort deposit from your joo at C. Do you have a divort deposit from your joo at C. Do you have a divort deposit from your joo at C. Do you have a divort deposit from your joo at C. Do you have a divort deposit from your joo at C. Do you have a divort deposit from your joo at C. Do you have a divort deposit from your joo at C. Do you have	2	earlier	associated with Monyet, LLC?	2	Q. Other than the 401(k)?
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them? A. I know Scottrade is a company and I know that s they paid us dividends. C. What did they pay you dividends for? A. I don't know. C. You don't know why you were being paid money Serma Scottrade? A. No. So. Did you set up any Scottrade account? A. No. So. Did you set up any Scottrade account? A. I have a personal Scottrade account? A. I have a personal Scottrade account? C. Bis that one of these listed? A. I have a personal Scottrade account? C. Did you know which one it in, the smaller number in or the bigger number? C. Do you know which one it in, the smaller number. C. Do you for you for und your Scottrade account? A. I don't know. C. I it looks like it was sold on July 1, 2013 and you set up any Scottrade account? A. That's correct. C. Do you know which one it in, the smaller number. C. So that long-term stocks, I see sale proceeds 7 95,544. A. I don't know. C. What would you have done with the 95,000 in proceeds that you received? A. I don't know. C. It looks like it was sold on July 1, 2013 and you see that you received 385,544? A. Okay. C. Do you know which one it in, the smaller number. C. So recollection of what that could be for? A. That's correct. C. From working? A. That's correct. C. Do you know which your Scottrade account? A. That's correct. C. Do you have a direct deposit from your job at the scott of the same account in your scott new your you have a direct deposit from your job at the scott of your account in your you have a direct deposit from your job at the scott of your account you you have a direct deposit from your job at the scott of your account you you have a direct deposit from your job at the scott of your you have a direct deposit from your job at the scott of your you have a direct deposit from your job at the scott of your you you have a direct deposit from your job at the scott of your your your your your your you	4	Q.	You don't know anything about this Scottrade?	4	Q. Other than the Roth?
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they paid us dividends. 0 Note did they pay you dividends for? 11 A. I don't know why you were being paid money 12 C. You don't know why you were being paid money 13 from Scottrade? 14 A. No. 15 O. Did you aset up any Scottrade accounts? 16 A. I have a personal Scottrade account. 17 O. Is that one of these listed? 18 A. I secure of the smaller number. 19 O. Do you know which one it is, the smaller number or or the bigger number? 20 O. From working? 21 A. I believe it's the smaller number. 22 O. From working? 23 A. What money I make. 24 O. From working? 25 A. Yes. Page 26 1 O. Do you know a direct deposit from your job at thus were solited spans. 26 O. Do you have a direct deposit from your job at the state and the two secretary or makes a state transfers to, for example, Scottrade? 25 A. That's correct. 26 O. Do you know what that's about? 27 A. I do. 28 A. That's correct or or working at the same and the state of the same and the	6	Q.	Okay. Do you know anything about either of	6	Q. So this long-term stocks, I see sale proceeds
they paid us dividends. 0. What did they pay you dividends for? A. I don't know. 0. You don't know why you were being paid money 12 A. No. 13 From Scottrade? 14 A. No. 15 O. Did you name up any Scottrade accounts? 16 A. I have a personal Scottrade account. 17 O. Is that one of these listed? 18 A. I assume so, yes. 19 O. Do you know which one it is, the smaller number or the bigger number? 20 or the bigger number? 21 A. T believe it's the smaller number. 22 O. How do you fund your Scottrade account? 23 A. With money I make. 24 O. From working? 25 A. Yes. 26 O. Do you know who direct deposit from your job at Shumaker & Sisffert? 27 A. Associated Bank. 28 O. And and from Associated Bank you can write checks. 30 O. If lower a reference to long-term stocks. 40 O. That's correct. 41 O. Is you have a seriesce to long-term stocks. 42 O. How you know what that's about? 43 A. I do. 44 A. No. 45 O. How you were that any long-term stocks? 46 A. T do. 47 O. How see that? 48 A. I do. 49 O. How you were that any long-term stocks? 50 A. I do. 51 O. How you know what that's about? 52 A. I do. 53 A. I do. 54 O. How you were that any long-term stocks? 55 A. O. How you know what that's about? 56 A. I have. 57 O. How you were that any long-term stocks? 58 A. I have. 59 O. How you know what that's about? 50 O. How you know what that's about? 51 A. I do. 52 A. I do. 53 A. I have. 54 A. I do. 55 O. How you were that any long-term stocks? 56 A. Thet's correct. 57 C. They you fly forward a couple of pages to long you know what that's about? 50 O. How you were that any long-term stocks? 51 A. I have. 52 A. They you fly forward a couple of pages to long you know what that's about? 54 A. No. 55 O. How you know what that's about? 56 A. Then's correct. 57 C. They you fly forward a couple of pages to long you know what you the page to the first than you fly forward a couple of page to long you know what you fly forward a couple of page to long you know what you was paged to long you know	7	them?		7	95,544. Did you guys sell stocks in 2013?
10 0. What did they pay you dividends for? 11 A. I don't know. 12 0. You don't know why you were being paid money 13 from Scottrade? 13 from Scottrade? 14 A. Mo. 15 0. Did you set up any Scottrade accounts? 16 A. I have a personal Scottrade accounts? 17 0. In that one of these listed? 18 A. I assume so, yes. 19 0. Do you know which one it is, the smaller number or or the bigger number? 20 A. I believe it's the smaller number. 21 A. Their scorrect. 22 O. How do you find your Scottrade accounts? 23 A. With money I make. 24 O. From working? 25 A. Yes. 26 C. Bo you have a direct deposit from your job at 2 Country in the section of what the could be for? A. Their secret. D. No recollection of what the could be for? A. Their secret. A. Okay. Q. No recollection of what the could be for? A. Their secret. A. Okay. Q. No recollection of what the could be for? A. Their secret. A. Okay. Q. No recollection of what the could be for? A. Their secret. A. Okay. Q. No recollection of what the could be for? A. Their secret. A. Okay. Q. No recollection of what the could be for? A. Their secret. A. Okay. Q. No recollection of what the could be for? A. Their secret. A. Okay. Q. No recollection of what the could be for? A. Their secret. A. Okay. Q. No recollection of what the could be for? A. Their secret. A. I don't remember. Q. What we shall not seem marked A. I don't m	8	A.	I know Scottrade is a company and I know that	8	A. That is my guess, yes.
A. I don't know. O. You don't know why you were being poid money 12 O. You don't know why you were being poid money 13 16 from Sectitade? 14 A. No. 15 O. Did you set up any Scottrade account? 16 A. I have a personal Scottrade account. 17 O. Is that one of these listed? 18 O. Do you know which one it is, the smaller number. 20 Or the bigger number? 21 A. I believe it's the smaller number. 22 O. How do you fund your Scottrade account? 23 A. With money I make. 24 O. Prom working? 25 A. Yes. Page 26 O. Do you have a direct deposit from your job at 26 O. Do you have a direct deposit from your job at 27 Shumaker & Sieffert? A. I do. O. And so from Associated Bank, you can write checks O. That's correct. O. If looks like it was sold on July 1, 2013 and O. No recollection of what that could be for? A. That's correct. C. What would you turn to what's been marked Exhibit 4. Let me know when you're there. A. Okay. O. Does this appear to be your 2014 income tax return? A. It does. Page 26 O. Do you have a direct deposit from your job at 10 O. More dones it go? A. Associated Bank. O. And so from Associated Bank you can write checks O. Til have you filp forward a couple of pages to form 8946 you'll see a reference to long-term stocks, do 11 you see that? A. I do. O. Do you know what that's about? A. No. O. Have you ever had any long-term stocks? O. Have you ever had any long-term stocks? A. A Case in the stock market, I don't remember the 19 Anames. O. Ard they chosen individually by you as opposed to a fund? A. That's correct. O. Ard are they with Scottrade? A. That's correct. 19 A. I don't know. O. Can you sacertain that by looking at the tax return? A. I don't know. O. You don't know what you made in 2014? A. No. O. Wou don't know what you made in 2014? A. No. O. Wou don't know what you made in 2014? A. No. O. And are they with Scottrade? A. No. O. And do you know what stocks were sold? A. No. O. And are they with Scottrade? A. Yes. O. Okay.	9	they pa	id us dividends.	9	Q. Did you play a role in deciding to sell any
Q. You don't know why you were being paid money 12 From Scattrade? 13 From Scattrade? 14 A. No. 15 Q. Did you set up any Scottrade accounts? 16 A. I have a personal Scottrade accounts? 17 Q. Is that one of these listed? 18 A. I assume so, yes. 19 Q. Be you know which one it is, the smaller number or or the bigger number? 20 or the bigger number? 21 A. I believe it's the smaller number. 22 Q. From working? 23 A. With money I make. 24 Q. From working? 25 A. Yes. 26 Q. Do you have a direct deposit from your job at 2 Shumbor & Sieffort? 27 A. A sesciated Bank. 28 Q. No were done it go? 29 A. Associated Bank. 20 Q. Where done it go? 20 A. A sesciated Bank. 21 Q. Where done it go? 22 A. Tad o. 23 A. Tad o. 24 Q. What would you have done with the 95,000 in proceeds that you received? 26 A. Can you account a country in the your sold on July 1, 2013 and 4 On Park you file for your 2014 income tax 2 return? 27 A. I do. 28 A. Tad o. 29 Page 26 Q. Does this appear to be your 2014 income tax 2 return? 29 A. Tad o. 20 Where done it go? 30 A. A sacciated Bank. 31 A. Tad o. 32 A. Tad o. 33 A. Tad o. 34 A. Tad o. 35 A. Tad o. 36 A. Tad or from Associated Bank you can write checks 7 or make transfers to, for example, Scottrade? 38 A. That's correct. 39 A. Tad o. 40 Q. Wou file forward a couple of pages to 90 You soo that? 41 A. No. 42 A. I do. 43 A. I do. 44 A. No. 45 A. I do. 46 Q. Do you know what that's about? 47 A. I do. 48 A. I do. 49 You don't know. 40 A. I don't know. 50 C. Can you accretain that by looking at the tax 2 return? 51 A. Mo. 52 A. I do. 53 A. Mone in the stock market, I don't remember the 18 A. I don't know. 54 A. No. 55 A. I don't know. 56 C. And sec they you ever had any long-term stocks? 57 A. Tad o. 58 A. Tad o. 59 A. Tad o. 59 A. Tad o. 50 A. Tad o. 51 A. Tad o. 51 A. Tad o. 51 A. Tad o. 52 A. Tad o. 53 A. Tad o.	10	Q.	What did they pay you dividends for?	10	stocks?
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O. Did you set up any Scottrade accounts? O. It looks like it was sold on July 1, 2013 and A. I have a personal Scottrade account. O. Is that one of these listed? A. I assume so. yes. O. Do you know which one it is, the smaller number or the bigger number? O. How do you fund your Scottrade account? A. I believe it's the smaller number. O. How do you fund your Scottrade account? A. With money I make. Dege 26 O. Do you know a direct deposit from your job at Shumaker & Sieffert? A. I do. Day and have a direct deposit from your job at Shumaker & Sieffert? A. I do. A. Associated Bank. O. And so from Associated Bank you can write checks or wake transfers to, for example, Scottrade? A. Tat's correct. O. If I have you flip forward a couple of pages to form 8946 you'll see a reference to long-term stocks, do li you see that? A. I do. O. Boy you know what that's about? A. No. O. Mas tkind of stocks? A. I don't know. O. Mas timore than \$100,000? A. No. O. Mas tkind of stocks? A. I have. O. Are they chosen individually by you as opposed to a fund? A. That's correct. O. And one in the stock market, I don't remember the names. O. Are they chosen individually by you as opposed to a fund? A. Nope. O. And are they with Scottrade? A. Nope. O. Did you give the direction to sell the stocks? A. I don't remember. D. Id you give the direction to sell the stocks? A. Nope. O. And are they with Scottrade? A. I don't remember. D. Id you give the direction to sell the stocks? A. That's correct. O. Did you give the direction to sell the stocks? A. I don't remember. D. Did you give the direction to sell the stocks? A. I don't remember. D. Did you give the direction to sell the stocks? A. I don't remember. D. Did you give the direction to sell the stocks? A. That's correct. D. Did you give the direction to sell the stocks? A. I don't remember. D. Did you give the direction to sell the stocks? A. That's correct. D. Did you give the direction to sell the stocks? A. I don't remember. D. Di	13	from Sco	ottrade?	13	proceeds that you received?
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A. I assume so, yes. Q. Do you know which one it is, the smaller number is bigger number? A. I believe it's the smaller number. Q. How do you fund your Scottrade account? A. With money I make. Q. From working? A. Yes. Page 26 Q. Do you have a direct deposit from your job at shimsker a Sleffert? A. I do. Q. More does it go? A. A secciated Bank. Q. And so from Associated Bank you can write checks? To rm make transfers to, for example, Scottrade? A. Tab. A. I do. Q. Ti I have you turn to what's been marked Exhibit 4. Let me know when you're there. A. Okay. Q. Do you have a direct deposit from your job at shimsker a Sleffert? A. Yes. Page 26 Q. Do you have a direct deposit from your job at shimsker a Sleffert? A. I do. Q. More much of that was earned by you as opposed to the debtor? A. Nasociated Bank. Q. And so from Associated Bank you can write checks? To rm was transfers to, for example, Scottrade? A. That's correct. Q. Can you ascertain that by looking at the tax roturn? A. I don't know. Q. Can you wknow what your income was in 2014? A. No. Q. You don't know what you made in 2014? A. No. Q. Was it more than \$100,000? A. No. Q. Was it more than \$100,000? A. I don't know. Q. Was it more than \$100,000? A. I don't know. Q. Was it more than \$100,000? A. I don't know. Q. Was it more than \$100,000? A. I don't know. Q. Was it more than \$100,000? A. I don't know. Q. Was it more than \$100,000? A. I don't know. Q. Was it more than \$100,000? A. I don't know. Q. Was it more than \$100,000? A. I don't know. Q. And do you know what stocks were sold? A. No. Q. Are they chosen individually by you as opposed to the debtor. A. No. Q. And do you know what stocks were sold? A. No. Q. And do you know what stocks were sold? A. No. Q. And do you know what stocks were sold? A. No. Q. And do you know what stocks were sold? A. No. Q. And do you know what stocks were sold? A. I don't remember. A. I don't know. Q. On you see that? A. I don't know. Q. Was the form \$849\$ yo	15	Q.	Did you set up any Scottrade accounts?	15	Q. It looks like it was sold on July 1, 2013 and
A. I assume so, yes. 0. Do you know which one it is, the smaller number 12 A. That's correct. 13 C. Do you know which one it is, the smaller number 24 A. That's correct. 25 A. With money I make. 26 Q. How do you fund your Scottrade account? 27 A. With money I make. 28 Q. Does this appear to be your 2014 income tax 29 Page 26 1 Q. Do you have a direct deposit from your job at 20 Shumaker & Sieffert? 21 A. I doe. 22 Q. And what was your income in 2014? 23 A. I do. 24 Q. Where does it go? 25 A. Associated Bank. 26 Q. And so from Associated Bank you can write checks or make transfers to, for example, Scottrade? 28 A. That's correct. 29 Q. Do you know what that's about? 20 Do you know what that's about? 21 A. I do. 22 A. No. 23 A. I do. 24 C. From working? 25 A. I don't know. 26 Q. And what was your income in 2014? 27 A. I don't know. 28 A. I don't know. 29 Q. If I have you flip forward a couple of pages to form 8946 you'll see a reference to long-term stocks, do 20 Do you know what that's about? 21 A. I do. 22 A. No. 23 A. I don't know. 24 C. From working? 25 A. I don't know. 26 C. Gon you ascertain that by looking at the tax 27 return? 28 A. I don't know. 29 Q. You don't know what your made in 2014? 20 Do you know what that's about? 21 A. No. 22 A. No. 23 A. I don't know. 24 A. No. 25 A. I don't know. 26 C. Was it more than \$100,000? 27 A. No. 28 A. I don't know. 29 Q. Was it more than \$100,000? 20 A. No es in the stock market, I don't remember the form we were looking at on Exhibit 3. Again, there's a reference to stock being sold on Agril 11, 2014 for \$150,000, do you see that? 28 A. That's correct. 29 Q. And dor they with Scottrade? 20 Q. And do you know what stocks were sold? 21 to a fund? 22 A. No. 23 Q. Okay. 24 A. Yes. 25 Q. And are they with Scottrade? 26 A. I don't remember. 27 Q. What remember. 28 A. That's correct. 29 Q. And are they with Scottrade? 20 A. And or they with Scottrade? 21 A. No. 22 Q. Okay.	16	A.	I have a personal Scottrade account.	16	you received \$95,544?
19 Q. Do you know which one it is, the smaller number 19 A. That's correct. Q. I'll have you turn to what's been marked Exhibit 4. Let me know when you're there. 20 Q. How do you fund your Scottrade account? 21 A. With money I make. 22 Q. Boes this appear to be your 2014 income tax return? 23 A. Yes. Page 26 Q. Do you have a direct deposit from your job at Shumaker & Sieffert? A. I does. Page 26 Q. Where does it go? A. Associated Bank. Q. Where does it go? A. Associated Bank. Q. And so from Associated Bank you can write checks or make transfers to, for example, Scottrade? A. That's correct. Q. To I have you filp forward a couple of pages to form 8946 you'll see a reference to long-term stocks, do 11 you see that? A. I do. Q. Do you know what that's about? A. No. Q. How much of that was earned by you as opposed to the debtor? A. I don't know. Q. Can you ascertain that by looking at the tax return? A. No. Q. You don't know what your income was in 2014? A. No. Q. Was it more than \$100,000? A. No. Q. Was it more than \$100,000? A. I daw. Q. What kind of stocks? A. I have. Q. What kind of stocks? A. I have. Q. What kind of stocks? A. I have. Q. Are they chosen individually by you as opposed to a fund? A. No. Q. Are they chosen individually by you as opposed A. No. Q. And do you know what stocks were sold? A. No. Q. And or transfer. Q. And or transfer. Q. And or transfer. Q. And or transfer. Q. Did you give the direction to sell the stocks? A. I don't remember. Q. Did you give the direction to sell the stocks? A. I don't remember. Q. Did you give the direction to sell the stocks? A. I don't remember. Q. Did you give the direction to sell the stocks? A. I don't remember.	17	Q.	Is that one of these listed?	17	A. Okay.
or the bigger number? A. I believe it's the smaller number. Q. How do you fund your Scottrade account? A. With money I make. Page 26 Q. Do you have a direct deposit from your job at Shumaker & Sieffert? A. I do. Q. Where does it go? A. Associated Bank. Q. And what was your income in 2014? A. Associated Bank. Q. Where does it go? A. Associated Bank. Q. If I have you flip forward a couple of pages to or make transfers to, for example, Scottrade? A. T do. Q. If I have you flip forward a couple of pages to you see that? Q. Do you know what that's about? A. I do. Q. Do you know what that's about? A. No. Q. Do you know what fact's about? A. No. Q. Do you know what fact's about? A. No. Q. Have you ever had any long-term stocks? A. I don't know. Q. Have you ever had any long-term stocks? A. I don't know Q. Have you ever had any long-term stocks? A. I don't know. Q. Have you ever had any long-term stocks? A. I don't know Q. Have you ever had any long-term stocks? A. I don't know Q. Have you ever had any long-term stocks? A. I don't know Q. Have you ever had any long-term stocks? A. I don't know Q. Have you ever had any long-term stocks? A. I don't know Q. Have you ever had any long-term stocks? A. I don't know Q. Have you ever had any long-term stocks? A. I don't know Q. Have you ever had any long-term stocks? A. I don't know Q. Have you ever had any long-term stocks? A. Ones in the stock market, I don't remember the Banes. Q. Are they chosen individually by you as opposed A. Nope. Q. And do you know what stocks were sold? A. Nope. Q. Do you know what stocks were sold? A. Nope. Q. Do you don't end A. Nope. Q. And or they with Scottrade? A. Nope. Q. Do you know what stocks were sold? A. Nope. Q. Do you don't end A. Nope. Q. And or they with Scottrade? A. Nope. Q. Do you don't end A. Nope. Q. Do you know what stocks were sold? A. Nope. Q. Do you don't end A. Nope. Q. Do you don't end A. Nope. Q. And do you know what stocks were sold? A. Nope. Q. D	18	A.	I assume so, yes.	18	Q. No recollection of what that could be for?
A. I believe it's the smaller number. 2.	19	Q.	Do you know which one it is, the smaller number	19	A. That's correct.
A. With money I make. Q. Prom working? A. Yes. Page 26 Q. Do you have a direct deposit from your job at Shumaker & Sieffert? A. I do. 4 Q. Where does it go? A. Associated Bank, you can write checks or make transfers to, for example, Scottrade? A. That's correct. Q. If I have you flip forward a couple of pages to form 8946 you'll see a reference to long-term stocks, do 10 you see that? A. I do. A. I do. A. I do. A. I do. A. That's correct. G. Do you know what that's about? A. I do. G. Do you know what that's about? A. I do. G. Do you know what that's about? A. No. Q. Where does it go? A. I don't know. Q. Can you ascertain that by looking at the tax return? A. I don't know. Q. Do you know what your income was in 2014? A. No. Q. Wou don't know what you made in 2014? A. No. Q. Was it more than \$100,000? A. No. Q. Was it more than \$100,000? A. I don't know Q. I'll have you flip ahead to form 8949 just like the one we were looking at on Exhibit 3. Again, there's a reference to stock being sold on April 11, 2014 for Sign, 201, do you see that? A. I don't know Q. Ard they chosen individually by you as opposed A. Noes in the stock market, I don't remember the names. Q. Are they chosen individually by you as opposed A. That's correct. Q. And are they with Scottrade? A. I don't remember. Q. And do you know what stocks were sold? A. Noes. Q. And are they with Scottrade? A. Yes.	20	or the l	bigger number?	20	Q. I'll have you turn to what's been marked
23 A. With money I make. 24 Q. From working? 25 A. Yes. Page 26 Q. Do you have a direct deposit from your job at 25 Shumaker & Sieffert? 26 A. I do. 27 Q. Mere does it go? 28 A. Sesciated Bank. 29 Q. And so from Associated Bank you can write checks or make transfers to, for example, Scottrade? 30 A. That's correct. 31 Q. To you know what that's about? 32 A. I do. 33 Q. Do you know what your income in 2014? 34 A. No. 35 Q. How much of that was earned by you as opposed to the debtor? 36 A. Associated Bank you can write checks or make transfers to, for example, Scottrade? 39 A. That's correct. 30 Q. To you ascertain that by looking at the tax return? 30 A. I don't know. 31 Q. Do you know what your income was in 2014? 32 A. No. 33 Q. Was it more than \$100,000? 34 A. No. 35 Q. Was it more than \$100,000? 36 Q. Was it more than \$100,000? 37 Q. Was it more than \$100,000? 38 A. Ones in the stock market, I don't remember the 18 \$19,010, do you see that? 39 Names. 40 Q. Are they chosen individually by you as opposed 20 Q. And do you know what stocks were sold? 41 A. That's correct. 42 Q. And are they with Scottrade? 43 Q. And are they with Scottrade? 44 A. Yes. 45 Q. And are they with Scottrade? 46 Q. May. 47 Yes. 48 A. That's correct. 49 Q. And are they with Scottrade? 40 Q. And are they with Scottrade? 41 Q. And are they with Scottrade? 42 Q. Okay.	21	A.	I believe it's the smaller number.	21	Exhibit 4. Let me know when you're there.
Page 26 Page 26 Page 28 Page	22	Q.	How do you fund your Scottrade account?	22	A. Okay.
Page 26 Q. Do you have a direct deposit from your job at 2 Shumaker & Sieffert? 2 Shumaker & Sieffert? 3 A. I do. 4 Q. Where does it go? 5 A. Associated Bank. 6 Q. And so from Associated Bank you can write checks or make transfers to, for example, Scottrade? 7 or make transfers to, for example, Scottrade? 8 A. That's correct. 9 Q. If I have you flip forward a couple of pages to 1 form 8946 you'll see a reference to long-term stocks, do 1 you see that? 1 Q. Do you know what that's about? 1 A. No. 1 Q. Do you know what that's about? 1 A. No. 1 Q. Do you know what that's about? 1 A. No. 1 Q. Do you know what that's about? 1 A. No. 1 Q. Was it more than \$100,000? 1 A. No. 1 Q. Was it more than \$100,000? 1 A. No. 1 A. I don't know. 9 Q. Was it more than \$101,000? 1 A. No. 1 Q. Was it more than \$100,000? 1 A. No. 1 Q. Was it more than \$100,000? 1 A. I don't know. 9 Q. Was it more than \$100,000? 1 A. No. 1 A. I don't know. 9 Q. Was it more than \$100,000? 1 A. No. 1 A. I don't know. 9 Q. Was it more than \$100,000? 1 A. No. 1 A. I don't know. 9 Q. Was it more than \$100,000? 1 A. No. 1 A. I don't know. 9 Q. Was it more than \$100,000? 1 A. No. 1 A. I don't know. 9 Q. Was it more than \$100,000? 1 A. No. 1 A. I don't know. 9 Q. Was it more than \$100,000? 1 A. No. 1 A. I don't know. 9 Q. Was it more than \$100,000? 1 A. I don't know. 9 Q. Was it more than \$100,000? 1 A. I don't know. 1 Q. Was it more than \$100,000? 1 A. I don't know. 1 Q. Was it more than \$100,000? 1 A. I don't know. 1 Q. Was it more than \$100,000? 1 A. I don't know. 1 Q. Was it more than \$100,000? 1 A. No. 1 Q. Was it more than \$100,000? 1 A. No. 1 Q. Was it more than \$100,000? 1 A. No. 1 Q. Was it more than \$100,000? 1 A. No. 1 Q. Was it more than \$100,000? 1 A. No. 1 Q. Was it more than \$100,000? 1 A. No. 1 Q. Was it more than \$100,000? 1 A. No. 1 Q. Was it more than \$100,000? 1 A. No. 1 Q. Was it more than \$100,000? 1 A. No. 2 Q. Mad do you know what stocks were sold? 2 A. No. 2 Q. And do you know what stocks were sold? 2 A. That's correct. 2 Q. Did you	23	A.	With money I make.	23	Q. Does this appear to be your 2014 income tax
Page 26 1 O. Do you have a direct deposit from your job at 2 Shumaker & Sieffert? 2 Shumaker & Sieffert? 3 A. I do. 4 Q. Where does it go? 5 A. Associated Bank. 6 Q. And so from Associated Bank you can write checks or make transfers to, for example, Scottrade? 7 or make transfers to, for example, Scottrade? 8 A. That's correct. 9 Q. If I have you filp forward a couple of pages to 6 form 8946 you'll see a reference to long-term stocks, do 10 you see that? 11 Q. You don't know what you made in 2014? 12 A. I do. 13 Q. Do you know what that's about? 14 A. No. 15 Q. Have you ever had any long-term stocks? 16 A. I have. 17 Q. What kind of stocks? 18 A. Ones in the stock market, I don't remember the 19 names. 19 Q. Are they chosen individually by you as opposed 20 Q. And you know what stocks were sold? 24 A. Yes. 25 Q. And are they with Scottrade? 26 Q. And over the debtor? 27 A. I don't know. 28 Q. Can you ascertain that by looking at the tax return? 29 A. I don't know. 20 Do you know what your income was in 2014? 20 A. No. 21 Q. Was it more than \$100,000? 21 A. No. 22 A. That's correct. 23 A. Yes. 24 A. Yes. 26 Q. And do you know what stocks were sold? 27 A. Nope. 28 A. That's correct. 29 Q. And are they with Scottrade? 20 Q. And or tremember. 21 A. Nope. 22 Q. Did you give the direction to sell the stocks? 23 A. I don't remember. 24 A. Yes. 25 Q. And are they with Scottrade? 26 Q. And or tremember. 27 A. Yes. 28 A. Yes. 29 Q. And are they with Scottrade? 20 Q. And or tremember. 20 Q. And or tremember. 21 A. Yes. 22 Q. Did you give the direction to sell the stocks? 23 A. I don't remember. 24 A. Yes. 25 Q. Onkay.	24	Q.	From working?	24	return?
Q. Do you have a direct deposit from your job at Shumaker & Sieffert? A. I do. Q. Where does it go? A. Associated Bank. Q. And so from Associated Bank you can write checks or make transfers to, for example, Scottrade? A. That's correct. Q. If I have you flip forward a couple of pages to form 8946 you'll see a reference to long-term stocks, do you see that? A. I do. Q. You don't know what your income was in 2014? A. No. Q. Do you know what your income was in 2014? A. No. Q. To you don't know what your income was in 2014? A. No. Q. You don't know what your income was in 2014? A. No. Q. You don't know what you made in 2014? A. No. Q. Was it more than \$100,000? A. I don't know. Q. Was it more than \$100,000? A. I don't know. Q. I'll have you flip head to form 8949 just like the one we were looking at on Exhibit 3. Again, there's a reference to stock being sold on April 11, 2014 for S19,010, do you see that? A. Yes. Q. And are they with Scottrade? A. I don't remember. Q. Do you know what stocks were sold? A. No. Q. Was it more than \$100,000? A. I don't know. Q. I'll have you flip head to form 8949 just like the one we were looking at on Exhibit 3. Again, there's a reference to stock being sold on April 11, 2014 for \$19,010, do you see that? A. Yes. Q. And are they with Scottrade? A. I don't remember. Q. Do you know what stocks were sold? A. Nope. Q. Do you know what stocks were sold? A. Nope. Q. Do you know what stocks were sold? A. Nope. Q. Do you know what stocks were sold? A. Nope. Q. Do you know what stocks were sold? A. Nope. Q. Do you know what stocks were sold? A. Nope. Q. Do you know what stocks were sold? A. Nope. Q. Do you know what stocks were sold? A. Nope. Q. Do you know what stocks were sold? A. I don't remember. Q. Do you know what stocks were sold? A. Nope. Q. Do you know what you income was in 2014? A. No. Q. You don't know what you made in 2014? A. No. Q. Use other throw. Q. I'll have you flip ahead to form 8949 just like the one we were looking at one Exhibit 3. Again, there's a reference to stock	25	A.	Yes.	25	A. It does.
A. I do. Q. Where does it go? A. Associated Bank. Q. And so from Associated Bank you can write checks or make transfers to, for example, Scottrade? A. That's correct. Q. If I have you flip forward a couple of pages to form 8946 you'll see a reference to long-term stocks, do you see that? A. I do. Q. Do you know what your income was in 2014? A. No. Q. Do you know what your made in 2014? A. No. Q. Do you know what you made in 2014? A. No. Q. Have you ever had any long-term stocks? A. I have. Q. Was it more than \$100,000? A. I don't know. Q. I'll have you flip ahead to form 8949 just like the one we were looking at on Exhibit 3. Again, there's a reference to stock being sold on April 11, 2014 for x a fund? X. Yes. Q. And are they with Scottrade? A. Yes. Q. Did you give the direction to sell the stocks? A. I don't remember. Q. Did you give the direction to sell the stocks? A. I don't remember. Q. Did you give the direction to sell the stocks? A. I don't remember. Q. Did you give the direction to sell the stocks? A. I don't remember. Q. Did you give the direction to sell the stocks? A. Yes. Q. And are they with Scottrade? Q. And are they with Scottrade? Q. Okay.			Page 26		Page 28
A. I do. Q. Where does it go? A. Associated Bank. Q. And so from Associated Bank you can write checks or make transfers to, for example, Scottrade? A. That's correct. Q. If I have you flip forward a couple of pages to form 8946 you'll see a reference to long-term stocks, do you see that? A. I do. Q. Do you know what your income was in 2014? A. No. Q. You don't know what you made in 2014? A. No. Q. Was it more than \$100,000? A. No. Q. Was it more than \$100,000? A. I don't know. Q. I'll have you flip ahead to form 8949 just like the one we were looking at on Exhibit 3. Again, there's a reference to stock being sold on April 11, 2014 for A. Yes. Q. And are they with Scottrade? A. That's correct. Q. And are they with Scottrade? A. Yes. Q. Okay.	1	Q.	Do you have a direct deposit from your job at	1	Q. And what was your income in 2014?
4 Q. Where does it go? 5 A. Associated Bank. 6 Q. And so from Associated Bank you can write checks 7 or make transfers to, for example, Scottrade? 8 A. That's correct. 9 Q. If I have you flip forward a couple of pages to 10 form 8946 you'll see a reference to long-term stocks, do 11 you see that? 12 A. I do. 13 Q. Do you know what that's about? 14 A. No. 15 Q. Have you ever had any long-term stocks? 16 A. I have. 17 Q. What kind of stocks? 18 A. Ones in the stock market, I don't remember the 19 names. 10 Q. Are they chosen individually by you as opposed 10 A. No. 11 Yes. 12 A. I don't know. 13 Q. Was it more than \$100,000? 14 A. Ones in the stock market, I don't remember the 18 A. Ones in the stock market, I don't remember the 19 names. 19 Q. Are they chosen individually by you as opposed 20 Q. And do you know what stocks were sold? 21 A. Nope. 22 A. That's correct. 23 Q. And are they with Scottrade? 24 A. Yes. 24 Q. Okay.	2	Shumaker	r & Sieffert?	2	A. It looks like it was \$81,618.
A. Associated Bank. Q. And so from Associated Bank you can write checks or make transfers to, for example, Scottrade? A. That's correct. Q. If I have you flip forward a couple of pages to form 8946 you'll see a reference to long-term stocks, do you see that? L. A. I do. L. D. Do you know what that's about? A. No. L. D. Do you know what that's about? L. D. Have you ever had any long-term stocks? L. D. Have you ever had any long-term stocks? L. D. Have you ever had any long-term stocks? L. D. What kind of stocks market, I don't remember the L. D. What kind of stocks were sold? L. D. What kind of stocks were sold? L. D. What stocks market, I don't remember the L. What's correct. L. D. What kind of you know what stocks were sold? L. D. What stocks were sold? L. D. What's correct. L. D. What's correct. L. D. What's correct what stocks were sold? L. D. D. What's correct what stocks were sold? L. D. D. What's correct what stocks were sold? L. D. D. What's correct what stocks were sold? L. D. D. What's correct what stocks were sold? L. D. D. What's know. L. D. D. You don't know. L. D. D. What kind on't know. L. D. D. D. You don't know. L. D. D. D. O.	3	A.	I do.	3	Q. How much of that was earned by you as opposed to
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7 or make transfers to, for example, Scottrade? 8 A. That's correct. 9 Q. If I have you flip forward a couple of pages to 10 form 8946 you'll see a reference to long-term stocks, do 11 you see that? 12 A. I do. 13 Q. Do you know what that's about? 14 A. No. 15 Q. Have you ever had any long-term stocks? 16 A. I have. 17 Q. What kind of stocks? 18 A. Ones in the stock market, I don't remember the 19 names. 20 Q. Are they chosen individually by you as opposed 21 to a fund? 22 A. That's correct. 23 Q. And are they with Scottrade? 24 A. Yes. 29 Q. And are they with Scottrade? 20 Q. Okay. 7 return? A. I don't know. Q. Do you know what your income was in 2014? A. No. Q. Do you know what your income was in 2014? A. No. Q. Do you know what your made in 2014? A. No. Q. Was it more than \$100,000? A. I don't know. Q. I'll have you flip ahead to form 8949 just like the one we were looking at on Exhibit 3. Again, there's a reference to stock being sold on April 11, 2014 for \$19,010, do you see that? A. Yes. Q. And do you know what stocks were sold? A. Nope. Q. Did you give the direction to sell the stocks? A. I don't remember. Q. Okay.	5	A.	Associated Bank.	5	A. I don't know.
A. That's correct. 9	6	Q.	And so from Associated Bank you can write checks	6	Q. Can you ascertain that by looking at the tax
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10 form 8946 you'll see a reference to long-term stocks, do 11 you see that? 12 A. I do. 13 Q. Do you know what that's about? 14 A. No. 15 Q. Have you ever had any long-term stocks? 16 A. I have. 17 Q. What kind of stocks? 18 A. Ones in the stock market, I don't remember the names. 19 names. 20 Q. Are they chosen individually by you as opposed to a fund? 21 A. No. 22 A. That's correct. 23 Q. And are they with Scottrade? 24 A. Yes. 29 You don't know what you made in 2014? A. No. 10 Q. You don't know what you made in 2014? A. No. 11 Q. You don't know what you made in 2014? A. No. 12 A. No. 13 Q. Was it more than \$100,000? A. I don't know. 14 A. I don't know. 15 Q. I'll have you flip ahead to form 8949 just like the one we were looking at on Exhibit 3. Again, there's a reference to stock being sold on April 11, 2014 for sold you see that? A. Yes. 20 Q. And do you know what stocks were sold? 21 A. Nope. 22 A. That's correct. 23 Q. And are they with Scottrade? 24 Q. Okay.	8	A.	That's correct.	8	A. I don't know.
11 you see that? A. I do. Q. Do you know what that's about? A. No. 14 A. I don't know. Q. Have you ever had any long-term stocks? A. I have. Q. What kind of stocks? A. Ones in the stock market, I don't remember the names. Q. Are they chosen individually by you as opposed 12 A. No. 13 Q. Was it more than \$100,000? A. I don't know. Q. I'll have you flip ahead to form 8949 just like the one we were looking at on Exhibit 3. Again, there's a reference to stock being sold on April 11, 2014 for a reference to stock being sold on April 11, 2014 for \$19,010, do you see that? 19 names. Q. Are they chosen individually by you as opposed 20 Q. And do you know what stocks were sold? 21 to a fund? 22 A. That's correct. Q. And are they with Scottrade? Q. Did you give the direction to sell the stocks? Q. And are they with Scottrade? Q. Okay.	9	Q.	If I have you flip forward a couple of pages to	9	Q. Do you know what your income was in 2014?
A. I do. Q. Do you know what that's about? A. No. 14 A. I don't know. Q. Have you ever had any long-term stocks? 15 Q. I'll have you flip ahead to form 8949 just like 16 A. I have. 17 Q. What kind of stocks? 18 A. Ones in the stock market, I don't remember the 19 names. Q. Are they chosen individually by you as opposed 20 Q. Are they chosen individually by you as opposed 21 to a fund? 22 A. No. 22 Q. Did you give the direction to sell the stocks? 33 Q. And are they with Scottrade? 24 A. Yes. 29 Q. Okay.	10			10	
Q. Do you know what that's about? A. No. Q. Have you ever had any long-term stocks? 15 Q. I'll have you flip ahead to form 8949 just like 16 A. I have. 17 Q. What kind of stocks? 18 A. Ones in the stock market, I don't remember the 19 names. Q. Are they chosen individually by you as opposed 20 Q. Are they chosen individually by you as opposed 21 to a fund? 22 A. That's correct. Q. And are they with Scottrade? 24 A. Yes. 29 Okay.	11	_		11	_
A. No. Q. Have you ever had any long-term stocks? 15 Q. I'll have you flip ahead to form 8949 just like A. I have. Q. What kind of stocks? A. Ones in the stock market, I don't remember the names. Q. Are they chosen individually by you as opposed to a fund? A. That's correct. Q. And are they with Scottrade? A. Yes. Q. Okay.	12	A.		12	
Q. Have you ever had any long-term stocks? A. I have. Q. What kind of stocks? A. Ones in the stock market, I don't remember the names. Q. Are they chosen individually by you as opposed to a fund? A. That's correct. Q. And are they with Scottrade? A. Yes. Q. Are they one we were looking at on Exhibit 3. Again, there's a reference to stock being sold on April 11, 2014 for 18 \$19,010, do you see that? A. Yes. Q. And do you know what stocks were sold? A. Nope. Q. Did you give the direction to sell the stocks? A. I don't remember. Q. Okay.	13	Q.		13	
A. I have. Q. What kind of stocks? A. Ones in the stock market, I don't remember the names. Q. Are they chosen individually by you as opposed to a fund? A. That's correct. Q. And are they with Scottrade? A. Yes. 16 the one we were looking at on Exhibit 3. Again, there's a reference to stock being sold on April 11, 2014 for sign, and a reference to stock being sold on April	14	A.	No.	14	
Q. What kind of stocks? A. Ones in the stock market, I don't remember the names. Q. Are they chosen individually by you as opposed to a fund? A. That's correct. Q. And are they with Scottrade? A. Yes. Q. Okay.	15	Q.		15	
A. Ones in the stock market, I don't remember the names. 19	16			16	
names. Q. Are they chosen individually by you as opposed 20 Q. And do you know what stocks were sold? 21 to a fund? 22 A. That's correct. 23 Q. And are they with Scottrade? 24 A. Yes. 25 Q. Okay.	17	Q.	What kind of stocks?	17	a reference to stock being sold on April 11, 2014 for
Q. Are they chosen individually by you as opposed 20 Q. And do you know what stocks were sold? to a fund? 21 A. Nope. 22 A. That's correct. 22 Q. Did you give the direction to sell the stocks? Q. And are they with Scottrade? 23 A. I don't remember. 24 A. Yes. 24 Q. Okay.	18	A.	Ones in the stock market, I don't remember the	18	\$19,010, do you see that?
to a fund? 21 A. Nope. 22 A. That's correct. 23 Q. And are they with Scottrade? 24 A. Yes. 29 Q. Okay.	19	names.		19	
A. That's correct. 22 Q. Did you give the direction to sell the stocks? 23 Q. And are they with Scottrade? 24 A. Yes. 26 Q. Okay.	20			20	Q. And do you know what stocks were sold?
Q. And are they with Scottrade? A. Yes. 23 A. I don't remember. Q. Okay.	21	to a fur	nd?	21	A. Nope.
24 A. Yes. 24 Q. Okay.	22	A.	That's correct.	22	Q. Did you give the direction to sell the stocks?
	23	Q.	And are they with Scottrade?	23	
25 Q. Any other companies that you use to invest? 25 MR. SHEU: I'll have another exhibit marked	24	A.	Yes.	24	Q. Okay.
	25	Q.	Any other companies that you use to invest?	25	MR. SHEU: I'll have another exhibit marked

	10/20	740	rage: o
	Page 29		Page 31
1	at this time.	1	A. He was a 3L and I was 1L.
2	(Browne Deposition Exhibit Number 5	2	Q. What year did you graduate?
3	marked for identification.)	3	A. 2009.
4	Q. I'm going to hand you what's been marked as	4	Q. What did you do after you graduated?
5	Exhibit 5. I don't expect you to have read this before,	5	A. I took the bar.
6	per se, but I'll have you flip ahead. Within Exhibit 5	6	Q. What did you do for employment after you took
7	you'll see several exhibits, one is Exhibit H. I think	7	the bar? I presume you passed.
8	you're a little past it, go back one more. Yep, right	8	A. I did pass the bar, yes. I started working at a
9	there, Exhibit H. So if you flip to the next page	9	law firm called Crawford Manno in about October of 2009,
10	you'll see what looks like an opening application for a	10	I think October, I'm not positive.
11	TCF Bank account, do you see that?	11	Q. How long did you work there?
12	A. Yep.	12	A. I'm really, I'm sorry, I'm really bad at dates.
13	Q. And it looks like it's from Monyet, LLC, do you	13	I think until January 2011, but I'm not positive.
14	see that?	14	Q. What did you do after working at that law firm?
15	A. Yes.	15	A. I started working at Shumaker & Sieffert.
16	Q. Now did you have any signatory authority for	16	Q. And you've been there ever since?
17	this Monyet, LLC account at TCF Bank?	17	A. No.
18	A. No, I don't think so.	18	Q. Were you with Shumaker & Sieffert for a short
19	Q. Did you know about it?		period and then left to go somewhere else?
	A. Yes.	19	A. I quit in 2013, I think it was 2013, and then
20		20	went back shortly. So I quit in August of 2013 and went
21	Q. You knew it was being opened? A. That's correct.	21	
22		22	back either at the end of December or beginning of
23	Q. It was being opened as part of the Mill Trust	23	January 2014.
24	estate plan?	24	Q. Quit as in took a leave or quit, quit?
25	A. Presumably, yes.	25	A. Quit.
	Dage 20		
	Page 30		Page 32
1	Q. I'll have you flip ahead a few pages. And	1	Page 32 Q. What for?
1 2		1 2	_
	Q. I'll have you flip ahead a few pages. And		Q. What for?
2	Q. I'll have you flip ahead a few pages. And you'll see a Scottrade broker's account application, do	2	Q. What for? A. I thought I had another job offer.
2	Q. I'll have you flip ahead a few pages. And you'll see a Scottrade broker's account application, do you see that?	2	Q. What for?A. I thought I had another job offer.Q. I'll have you flip ahead a page in Exhibit 5.
2 3 4	Q. I'll have you flip ahead a few pages. And you'll see a Scottrade broker's account application, do you see that? A. I do.	2 3 4	Q. What for? A. I thought I had another job offer. Q. I'll have you flip ahead a page in Exhibit 5. The next document appears to be the operating agreement
2 3 4 5	Q. I'll have you flip ahead a few pages. And you'll see a Scottrade broker's account application, do you see that? A. I do. Q. And I see two signatures at the bottom for	2 3 4 5	Q. What for? A. I thought I had another job offer. Q. I'll have you flip ahead a page in Exhibit 5. The next document appears to be the operating agreement of Monyet, LLC, do you see that?
2 3 4 5 6	Q. I'll have you flip ahead a few pages. And you'll see a Scottrade broker's account application, do you see that? A. I do. Q. And I see two signatures at the bottom for applicant authorized person's signature, they're both	2 3 4 5 6	Q. What for? A. I thought I had another job offer. Q. I'll have you flip ahead a page in Exhibit 5. The next document appears to be the operating agreement of Monyet, LLC, do you see that? A. Yes.
2 3 4 5 6 7	Q. I'll have you flip ahead a few pages. And you'll see a Scottrade broker's account application, do you see that? A. I do. Q. And I see two signatures at the bottom for applicant authorized person's signature, they're both dated December 27, 2010. Is one of those your	2 3 4 5 6 7	Q. What for? A. I thought I had another job offer. Q. I'll have you flip ahead a page in Exhibit 5. The next document appears to be the operating agreement of Monyet, LLC, do you see that? A. Yes. Q. Do you know if this was one of the documents
2 3 4 5 6 7 8	Q. I'll have you flip ahead a few pages. And you'll see a Scottrade broker's account application, do you see that? A. I do. Q. And I see two signatures at the bottom for applicant authorized person's signature, they're both dated December 27, 2010. Is one of those your signatures?	2 3 4 5 6 7 8	Q. What for? A. I thought I had another job offer. Q. I'll have you flip ahead a page in Exhibit 5. The next document appears to be the operating agreement of Monyet, LLC, do you see that? A. Yes. Q. Do you know if this was one of the documents that you produced today in the box that's sitting on the
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2 3 4 5 6 7 8 9 10 11	Q. I'll have you flip ahead a few pages. And you'll see a Scottrade broker's account application, do you see that? A. I do. Q. And I see two signatures at the bottom for applicant authorized person's signature, they're both dated December 27, 2010. Is one of those your signatures? A. I don't think so. Q. Do you recognize those signatures? A. I'm not sure whose they are, whose. Q. Would you recognize your husband's signature if	2 3 4 5 6 7 8 9 10 11 12	Q. What for? A. I thought I had another job offer. Q. I'll have you flip ahead a page in Exhibit 5. The next document appears to be the operating agreement of Monyet, LLC, do you see that? A. Yes. Q. Do you know if this was one of the documents that you produced today in the box that's sitting on the table here? A. I don't know. Q. You don't know? A. No.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. I'll have you flip ahead a few pages. And you'll see a Scottrade broker's account application, do you see that? A. I do. Q. And I see two signatures at the bottom for applicant authorized person's signature, they're both dated December 27, 2010. Is one of those your signatures? A. I don't think so. Q. Do you recognize those signatures? A. I'm not sure whose they are, whose. Q. Would you recognize your husband's signature if you saw it? A. Probably not. I don't see him sign things. Q. Have you seen his handwriting before? A. Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. What for? A. I thought I had another job offer. Q. I'll have you flip ahead a page in Exhibit 5. The next document appears to be the operating agreement of Monyet, LLC, do you see that? A. Yes. Q. Do you know if this was one of the documents that you produced today in the box that's sitting on the table here? A. I don't know. Q. You don't know? A. No. Q. Have you seen this document before? A. I assume, yes, I don't remember. Q. If you turn to Page 18 you'll see the signature pages?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. I'll have you flip ahead a few pages. And you'll see a Scottrade broker's account application, do you see that? A. I do. Q. And I see two signatures at the bottom for applicant authorized person's signature, they're both dated December 27, 2010. Is one of those your signatures? A. I don't think so. Q. Do you recognize those signatures? A. I'm not sure whose they are, whose. Q. Would you recognize your husband's signature if you saw it? A. Probably not. I don't see him sign things. Q. Have you seen his handwriting before? A. Yes. Q. You guys were married in 2011? A. That's correct.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. What for? A. I thought I had another job offer. Q. I'll have you flip ahead a page in Exhibit 5. The next document appears to be the operating agreement of Monyet, LLC, do you see that? A. Yes. Q. Do you know if this was one of the documents that you produced today in the box that's sitting on the table here? A. I don't know. Q. You don't know? A. No. Q. Have you seen this document before? A. I assume, yes, I don't remember. Q. If you turn to Page 18 you'll see the signature pages? A. So yes, I have seen it before, I signed it. Q. Is that your signature?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. I'll have you flip ahead a few pages. And you'll see a Scottrade broker's account application, do you see that? A. I do. Q. And I see two signatures at the bottom for applicant authorized person's signature, they're both dated December 27, 2010. Is one of those your signatures? A. I don't think so. Q. Do you recognize those signatures? A. I'm not sure whose they are, whose. Q. Would you recognize your husband's signature if you saw it? A. Probably not. I don't see him sign things. Q. Have you seen his handwriting before? A. Yes. Q. You guys were married in 2011? A. That's correct. Q. And how long had you been together before that? A. We started, I think we started dating in 2006. Q. Was that in law school?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. What for? A. I thought I had another job offer. Q. I'll have you flip ahead a page in Exhibit 5. The next document appears to be the operating agreement of Monyet, LLC, do you see that? A. Yes. Q. Do you know if this was one of the documents that you produced today in the box that's sitting on the table here? A. I don't know. Q. You don't know? A. No. Q. Have you seen this document before? A. I assume, yes, I don't remember. Q. If you turn to Page 18 you'll see the signature pages? A. So yes, I have seen it before, I signed it. Q. Is that your signature? A. It is. Q. Padraigin Lane Browne, trustee of the Mill Trust, is that correct?
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	Page 33		Page 35	
1	A. That's correct.	1	just skip past that. And the next one is an	
2	Q. Is it the sole member?	2	investment/loan to Livewire from Monyet, LLC for \$10,000	
3	A. Yes.	3	transferred in June of 2013, do you see that?	
4	Q. Okay. And Mr. Hansmeier is listed as the	4	A. I do.	
5	manager of Monyet, LLC, is that correct?	5	Q. Are you familiar with Livewire?	
6	A. That is correct.	6	A. No.	
7	Q. Is that your recollection of how it was all set	7	Q. Have you ever heard of Livewire?	
8	up?	8	A. Yes.	
9	A. Yes.	9	Q. What do you know about it?	
10	Q. This document doesn't seem to be dated. Do you	10	A. That it's a company.	
11	know when this would have been signed?	11	Q. What else other than the fact it's a company?	
12	A. No.	12	A. That's it.	
13	Q. Was it, do you have a date range? Obviously	13	Q. Is it a, is it a company that your husband is	
14	after law school and before today.	14	associated with in any fashion whatsoever?	
15	A. I would even go after law school and before	15	A. Not that I'm aware of.	
16	whatever day that Scottrade was opened.	16	Q. You have no idea if he's an investor or a	
17	Q. Before the Scottrade was opened in 2010?	17	creditor of Livewire?	
18	A. Yep, I'd feel comfortable saying that.	18	A. I don't know.	
19	Q. Okay. Were you married at this time?	19	Q. Who handles the finances in your family?	
20	A. No.	20	A. I need you to be more specific.	
21	Q. So why, why were you guys setting up a trust	21	Q. Well, usually someone pays attention in a family	
22	when you weren't married?	22	to how much money people have, paying bills and so	
23	A. We knew we were going to get married.	23	forth. Is it both of you guys, do you guys do it each	
24	Q. So it was in anticipation of getting married?	24	yourselves when you set up a trust together before you	
25	A. I think so.	25	got married?	
	Page 34		Page 36	
1	Q. How old were you guys when you, in 2010 let's	1	A. I think we both pay some attention to our	
2	say?	2	finances.	
3	A. Depending on the time of year, I would be 28 or	3	Q. So you, I'm trying to figure out if you would	
4	27 I think, yeah.	4	know what the debtor is up to with his finances, such as	
5	O. And how old is Mr. Hansmeier?	5	investment companies?	
6	A. He's a year older than me.	6	A. I do not have access to his private bank	
7	Q. Do you guys, do you know why you set up a	7	accounts, just as he does not have access to my personal	
8	Delaware LLC?	8	private bank accounts.	
9	A. Because that's where people set up LLC's,	9	Q. What private bank accounts does he have?	
10	Delaware.	10	A. I don't know.	
11	Q. They set them up here too.	11	Q. So he may have none, is that what you're saying?	
12	A. I'm guessing that Lee McCullough, assuming that	12	A. That's correct, or he, yeah.	
13	is actually the attorney, told us to do it there.	13	Q. I'll have you flip ahead to the next one which	
14	Q. How did you find out about Mr. McCullough?	14	is also Livewire Holdings, a transfer to Livewire	
15	A. I don't remember.	15	Holdings from Monyet in June of 2013 for \$10,000.	
16	Q. Did you actually meet with Mr. McCullough?	16	Again, your testimony now under oath is that you have no	
17	A. In person, no.	17	idea what this could be for?	
18	Q. Do you know if the debtor did?	18	A. That's correct.	
19	A. No, I don't.	19	Q. I'll have you flip ahead to the next one which	
20	Q. I'll have you flip ahead past the operating	20	you can skip, and the next one after that. And then the	
21	agreement in Exhibit 5. You'll see a series of	21	next one that says recipient is Class Justice, PLLC,	
22	Scottrade authorizations to wire brokerage fund	22	\$25,000 transfer from Monyet on July 26, 2013, do you	
23	documents, do you see those?	23	see that?	
24	A. Yes.	24	A. Yes.	
25	Q. Now the first one is for an appellate bond, I'll	25	Q. Are you familiar with Class Justice, PLLC?	
دعا		123	±	

Page 37 Page 39 I've heard of it before. Q. Did you provide statements for 2013? 1 You've heard of it? A. I provided statements for the entire time that 2 that account was open. 3 Q. Is that your husband's law firm? Q. Did you also have an Associated Bank account at 4 I think so. the same time during 2013? 5 You think so, you don't know that for a fact? A. Yes. 6 6 A. That's correct. 7 Q. So what was the purpose of having another bank 7 Q. I'll have you flip ahead to the next one which account, that TCF Financial Bank account? 8 hopefully you'll know something about, the recipient is A. TCF Bank asked me to open up a personal bank 9 10 yourself, it's \$5,000 on July 30, 2013, the reason for account when we had the, got the mortgage, so I did. 10 the request is personal transfer. Do you know what that Q. And you don't know where this \$30,000 went? 11 11 12 was for? 12 A. Not specifically, no. MS. MAY: What was the date on that? Q. Is there any way we'll be able to find that out? 13 13 MR. SHEU: July 30, 2013. A. I would look at the statements that I provided. 14 14 A. I don't remember what the money was for. Q. I'll have you turn to the next page. Actually, 15 15 you can skip that. And the next page after that is a 16 Q. Do you know where you put the money? 16 \$25,000 loan from Monyet to Class Justice, PLLC. Are A. It went to my Associated Bank account. 17 17 18 Q. Do you remember where it went? 18 you familiar with your husband having loaned any money to anybody including any entities? 19 19 A. We would have talked about this, but I don't 20 Q. Do you know what you did with it? 20 A. I can't be positive, it was in 2013. remember because it was in 2013. 21 21 Q. Did you provide in the documents today any Q. Are there any loan agreements that you know of? 22 22 statements for Associated Bank? A. I don't know. 23 23 A. T did. Q. Do you know if there's any money that's owed to 24 Q. For 2013? you or your husband by anybody or any entity? 25 Page 38 Page 40 A. I personally am not owed any money that I know A. Yes, I provided six years of Associated Bank 1 1 of. account statements. 2 2 Q. Did you include copies of checks? Q. What about your husband? 3 3 A. I did not have those. A. I don't know. 4 4 Q. I'll have you turn to the next page. This is a Q. I'll have you turn to the next page which you 5 \$30,000 transfer from Monyet, Scottrade account, to can skip and the next page which you can also skip. And 6 6 yourself on August 27, 2013. Do you know what this was 7 then stop where it says the November 22, 2013 transfer 7 of \$175,000 to you from Monyet, Scottrade account. What 8 was this for? A. I don't know the exact specifics of why the 9 money was transferred, no, I don't remember. A. For personal and everyday living expenses. 10 10 Q. \$175,000? Q. Under reason for request it says, "Trust 11 11 agreement, " does that ring any bells for you? A. That's correct. 12 12 A. No. Q. This is transferred to your TCF Bank account? 13 13 Q. You have no idea why your husband was 14 14 transferring \$30,000 to you? Q. And so the, this \$175,000, your sworn testimony 15 15 A. Probably because we talked about it. is it's all been spent, is that correct? 16 16 Q. Do you know what you would have done with it? A. Well, the trust currently has approximately 17 17 A. I can't say for sure, but I'm assuming it went \$8,000 in it. 18 18 to pay everyday living expenses. Q. What was the most the trust ever had? 19 19 Q. It looks like the receiving institution was TCF A. I don't know. 20 20 Financial. Did you have an account at TCF Financial? Q. Who would know? 21 21 A. I don't know. 2.2 22 23 Q. Did you provide bank statements with your, that Q. You don't know who would know about --23 box? A. I don't know if anyone would know how much it 24 24 25 had, what the maximum amount that was ever in it. 25 A. Yes.

Dagm 41 C. Worldn't knew. 1. A. I don't know. 2. A. That's correct. 3. A. That's correct. 3. A. That's correct. 3. A. That's correct. 4. C. Worldn't heavy you want to define it, sure. 5. A. That's correct. 5. A. That's correct. 6. A. That's correct. 6. A. That's correct. 6. C. You're the trusted of this trust, right? 7. A. That's correct. 7. A. I don't know. 8. A. That's correct. 9. A. That's correct. 9. A. I don't know. 9. You've never heard of it? 9. A. That's correct. 10. This have been been before. 11. C. This have you want to define it, sure. 12. C. This have you want to the name before. 13. A Sillod transfer to know what that far? 14. A. I don't know you want to come that far? 15. C. Do you know any property in Florida? 16. A. That's correct. 17. C. Discussing what? 18. A. That's correct. 19. C. This wan faccamer at 2017 20. A. That's correct. 21. C. This wan faccamer at 2017 22. A. That's correct. 23. A. That's correct. 24. A. That's correct. 25. C. This wan faccamer at 2017 26. A. That's correct. 27. C. This wan faccamer at 2017 28. A. That's correct. 29. C. This wan faccamer at 2017 20. A. That's correct. 20. C. This wan faccamer at 2017 21. A. That's correct. 21. C. This wan faccamer at 2017 22. A. That's correct. 23. C. This wan faccamer at 2017 24. A. That's correct. 25. C. This wan faccamer at 2017 26. A. That's correct. 27. C. This wan faccamer at 2017 28. A. That's correct. 29. C. This wan faccamer at 2017 20. A. That's correct. 20. C. This wan faccamer at 2017 21. A. That's correct. 21. C. This wan faccamer, any parsonal car payment. 22. C. This wan faccamer are those? 23. C. This wan faccamer are those? 24. A. That's correct. 25. C. This wan faccamer are those? 26. C. This wan faccamer are those? 27. A. That want want that far a judgment against it want want that the correct is an interest that the correct is an interest that the correct is a judgment want that the correct is an interest that the correct is a judgment against is an in		10/28/2015 Page: 1			
2 over the would be some bank record of some port of the work there? 3 A. I dear't know. 4 C. You don't knew? 5 A. Ther's correct. 6 G. You tree the trustee of this trust, right? 7 A. That is correct. 8 O. This kind of your job to know what's in it, sen't that part of the job of a trustee? 9 C. This kind of your job to know what's in it, sen't that part of the job of a trustee? 10 A. If that's how you want to define it, sure. 11 O. This haw you turn to the most page. You'll see a 231,385 transfer. 12 S. A. The share. In a you know want to the heat page. You'll see a 231,385 transfer. 13 A. Making a lean or whatever this was, this is transfer. 14 A. The share. The going to asy I don't know because 2 T. A. That's correct. 15 Q. It was thocomber of 18137 16 A. That's correct. 17 A. That's correct. 18 A. That's correct. 19 C. You don't runmember two yourn ago 20 C. What was this loan or transfer for? 21 A. That's correct. 22 G. You don't runmember two yourn ago 23 G. You don't runmember two yourn ago 24 A. That's correct. 25 G. You don't runmember two yourn ago 26 G. You don't runmember two yourn ago 27 A. That's correct. 28 G. You don't runmember two yourn ago 29 G. You don't runmember two yourn ago 20 G. You don't runmember two yourn ago 21 G. You don't runmember two yourn ago 22 G. You don't runmember two yourn ago 23 G. You don't runmember two yourn ago 24 A. That's correct. 25 G. You don't runmember two yourn ago 26 G. You mort summember two yourn ago 27 A. That's correct. 28 A. That's correct. 39 A. The form of the was the set of the least one what that was the second 30 A. The second 31 G. You'll be a set of the sext began and then stop at the next one what that was 32 G. You may be set the sext of the sext began and then stop at the next one what that was 39 G. You were heard of it? 30 A. That's correct. 31 G. What's we this ago 31 G. What's we this ago 32 G. You don't runmember two yourn ago 33 G. You'll be a sext and the sext		Page 41		3	
South Reach, A. I dear't know. 2	1		1	_	
A. T don't know. 4 O. You don't wow? 5 A. That's correct. 5 A. That's correct be trustee of this trust, right? 5 A. That's correct				O. I'll have you flip ahead a couple of pages to	
0. You don't Knew? A. That's correct. O. To're the trustee of this trust, right? A. That is correct. O. This kind of your job to know what's in it, sin't that part of the job of a trustee? A. If that's how you want to define it, sure. O. Fill have you turn to the next page. You'll see 12 9 211,200 transfer to Knobert P. Asliebbes. O. Do you know anybody with property in Florida? A. If where have you heard the name? A. If don't Remember hearing about it, I don't remember that specific name. O. Do you know anybody with property in Florida? A. If don't premember hearing about it, I don't remember hearing about it, I don't have you remember hearing hearing about it, I don't have you remember hearing about it, I don't have you about hearing about it, I don't have you about hearing about any indifference it and have the case you about hearing about it, I don't have you about hearing about any indifference it any in					
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0. What is correct. 1. C. It's kind or your job to know what's in it. 2. Saint that part of the job of a truster? 2. A. If that's how you want to define it, sure. 3. O. I'l' hat's how you want to define it, sure. 4. O. I'll have you turn to the next page. You'll not leave the job of a truster? 4. A. I've hard the name before. 4. A. I've hard the name before. 5. O. Whore have you heard the name? 6. A. I've hard the name before. 6. A. I've hard the name before. 7. A. I don't remember any property in Florida? 8. A. I've hard the name before. 8. A. Mo. 9. Do you know anyhody with property in Florida? 9. A. I've hard the name before. 9. O. Whore have you heard the name? 9. O. Whore have you heard the name? 9. O. Whore have you heard this was, this 18 trensfer. 9. O. What was this loan or transfer for? 9. A. That's correct. 9. O. Who don't remember: It was a while ago. 9. O. You con't remember two years ago 9. O. You con't remember two years ago 9. O. You con't remember two years ago 9. O. Whore there you from Remyer, Rootsvade a count, on Pebruary 7, 2014. Do you know what that was 6 foor? 9. A. That money was used for everyday living 2 content of the property of the exhibit. 9. O. Who trougeness are those? 9. O. Who troug		A. That's correct.		- I	
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A. If that's how you want to define it, sure. 11 0. I'll have you want to define it, sure. 12 a 321,255 transfer to Robert P. Baisebee, 13 **A**L****L****L****. No you know who that is? 14 A. I've heard the name before. 15 0. Where have you heard the name? 16 A. In discussing this. 17 0. Discussing what? 18 A. I don't, yes, I do know some people that have property in Florida? 19 C. Discussing what? 10 0. Mho's that? 11 0. Mho's that? 12 0. Make was this loan or transfer for? 10 0. What was this loan or transfer for? 11 1 0. Discussing what. 12 0. Mho's that? 13 0. Mho's that? 14 A. Paul's aunt, for one. 15 0. Anybody clas? 16 A. I adiscussing what. 17 A. I baliawa, I'm going to say I don't know because 18 1 or it was lecember. It was a while ago. 20 0. What was this loan or transfer for? 21 A. That's correct. 22 0. Tou don't remember two years ago 23 0. It was lecember two years ago 24 A. That's correct. 25 0. Who's that? 26 0. Have you ever invested any money in Florida. 27 0. Have you ever invested any money in Florida. 28 2 0. What expenses are those? 29 A. That money was used for everyday living approach you know what that was approached and the served of the schibits? 29 0. What expenses are those? 20 0. It that money all gone? 21 account. 22 0. A tome point did you ever hear how your husband for account on response, dayears, my personal car payment. 29 0. A tome point did you ever hear how your husband for account on the process of the exhibits? 20 0. It that money all gone? 21 account. 22 0. Sha's was this property in Florida? 23 0. Have you ever invested any money in Florida. 24 0. O. Have you ever invested any money in Florida. 25 0. Have you ever invested any money in Florida. 26 0. Do be could have since you don't know? 27 0. O. Olay We can see aside Exhibit 5. And by the way, let me know if you ever need to take a break to go to the bathroom, get a drink o		isn't that part of the job of a trustee?	9	A. I don't remember hearing about it, I don't	
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B-A-L-3-8-8-8-8. Do you know who that is? A. I've heard the name before. A. If we heard the name before. A. In discussing this. O. Discussing what? A. In discussing this. If O. Discussing what? O. Making a loan or whatever this was, this B. C. Anybody else? A. I don't meamber. O. Have you ever invested any money O. Have you ever invested any money in Florida. O. Have you ever invested any money in Florida. O. Have you ever invested any money in Florida. O. Have you ever invested any money in Florida. O. Have you ever invested any money in Florida. O. Have you ever invested any money in Florida. O. Have you ever invested any money in Florida. O. Have you ever invested any money in Florida. O. Have you ever invested any money in Florida. O. Have you ever invested any money in Florida. O. Have you ever invested any money in Florida. O. Discussing what. A. I don't know. Page 42 A. No. O. Discussing what. A. I don't know. A. I don't know. O. Okay. We can set aside Exhibit 5. And by the way. Iet me know if you ever need to take break to go to the bathroom, get a drink of water. O. Discussing what. M. May: Can you make sure that I get topics of the exhibits. MR. SHEU: Was. SHEU: Was. MR. SHEU: Was. SHEU: Okay. Can we mark another one. O. There's a few judgments, is that correct, is that your understanding? A. I don't know the specifics. I know vere here O. Have you ever invested any money in Florida. O. Discussing white.		a \$21,250 transfer to Robert P. Balzebre,	12	A. No.	
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15 Q. Where have you heard the name? 16 A. In discussing this. 16 A. In discussing this. 17 O. Discussing what? 18 A. Making a loan or whatever this was, this 19 Transfer. 19 Q. What was this loan or transfer for? 20 Q. What was this loan or transfer for? 21 A. I believe. I'm going to say I don't know because 22 I don't remember. It was a while ago. 23 Q. It was December of 2013? 24 A. That's correct. 25 Q. You don't remember two years ago 26 Q. You don't remember two years ago 27 Q. That's correct. 28 Q a \$21,000 loan? I'll have you turn, skip the account, on Pebruary 7, 2014. Do you know what that was account, on Pebruary 7, 2014. Do you know what that was account, on Pebruary 7, 2014. Do you know what that was account, on Pebruary 7, 2014. Do you know what that was account. 29 Q. Mat expenses are those? 30 Q. What expenses are those? 31 A. That money was used for everyday living expenses. 32 Q. Is that money all gone? 33 A. There's approximately \$8,000 left in the trust food, utilities. I don't know, what everybody spends and have the transcript include all of the exhibits. 31 May. May. May. Court Reportor, make sure that I get to prove the same how your husband for a copy of the skimbits. 34 A. Yes, I am aware that there is a judgment against him? 35 A. Yes, I am aware that there is a judgment against him? 36 A. Yes, I am aware that there is a judgment against that you understanding? 39 Q. There's a few judgments, is that correct, is that your understanding? 30 Q. There's a few judgments, is that correct, is that you understanding? 31 Control of the whibits. 32 May. Shill I won't necessarily be asking for a copy of the exhibits. 39 Washand. 40 Q. May husband. 41 A. There's approximately \$1.000 left in the trust that have been marked with the court reporter and have the transcript include all of the exhibits. 42 A. There's a few judgments, is that correct, is converted to the sking of the court reporter and have the transcript include all of the exhibits. 43 May husband. 44 A. There's a few judgmen		A. I've heard the name before.			
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A. That money was used for everyday living 8 expenses. 9 Q. What expenses are those? 10 A. Our mortgage, daycare, my personal car payment, 11 food, utilities. I don't know, what everybody spends 11 money on. 12 money on. 13 Q. Is that money all gone? 14 A. There's approximately \$8,000 left in the trust 15 account. 16 Q. At some point did you ever hear how your husband 17 had a judgment against him? 18 A. Yes, I am aware that there is a judgment against 19 my husband. 10 Q. There's a few judgments, is that correct, is 10 that your understanding? 20 A. I don't know the specifics. I know we're here 21 today. 22 Q. Okay. We can set aside Exhibit 5. And by the 28 way, let me know if you ever need to take a break to go 4 to the bathroom, get a drink of water. MS. MAY: Can you make sure that I get 4 copies of the exhibits? MR. SHEU: Yes. MR. SHEU: My intention is to leave the 4 exhibits that have been marked with the court reporter 4 and have the transcript include all of the exhibits. MS. MAY: But I won't necessarily be asking 4 for a copy of the transcript, which is why I'm asking 5 for a copy of the exhibits. MR. SHEU: Was intention is to leave the 6 exhibits that have been marked with the court reporter 8 and have the transcript, which is why I'm asking 9 for a copy of the exhibits. MR. SHEU: My intention is to leave the 8 way, let me know if you ever need to take a break to go 9 to the bathroom, get a drink of water. MS. MAY: But I was in the trust of the exhibits. MR. SHEU: Yes. MR. SHEU: Was in the trust of the exhibits. MR. SHEU: My intention is to leave the exhibits that have been marked with the court reporter and have the transcript, which is why I'm asking 9 for a copy of the exhibits. MR. SHEU: Okay. Can we mark another one. (Browne Deposition Exhibit Number 6 9 marked for identification.) (Attorney Paul Godfread entered the	5	account, on February 7, 2014. Do you know what that was	5	Q. So he could have since you don't know?	
8 expenses. 9 Q. What expenses are those? 10 A. Our mortgage, daycare, my personal car payment, 11 food, utilities. I don't know, what everybody spends 11 copies of the exhibits? 12 money on. 13 Q. Is that money all gone? 14 A. There's approximately \$8,000 left in the trust 15 account. 16 Q. At some point did you ever hear how your husband 17 had a judgment against him? 18 A. Yes, I am aware that there is a judgment against 19 my husband. 20 There's a few judgments, is that correct, is 21 that your understanding? 22 A. I don't know the specifics. I know we're here 23 today. 24 Q. When did you first learn about any judgments or 24 (Attorney Paul Godfread entered the	6	for?	6	A. I don't know.	
Q. What expenses are those? 10 A. Our mortgage, daycare, my personal car payment, 11 food, utilities. I don't know, what everybody spends 12 money on. 13 Q. Is that money all gone? 14 A. There's approximately \$8,000 left in the trust 15 account. 16 Q. At some point did you ever hear how your husband 17 had a judgment against him? 18 A. Yes, I am aware that there is a judgment against 19 my husband. Q. There's a few judgments, is that correct, is 10 the bathroom, get a drink of water. 10 MS. MAY: Can you make sure that I get 11 copies of the exhibits? 12 MR. SHEU: Yes. 13 MS. MAY: Ms. Court Reporter, make sure 14 that you catch that I asked for copies of the exhibits. 16 MR. SHEU: My intention is to leave the 17 exhibits that have been marked with the court reporter 18 and have the transcript include all of the exhibits. 19 MS. MAY: But I won't necessarily be asking 19 for a copy of the transcript, which is why I'm asking 20 for a copy of the exhibits. 21 that your understanding? 22 A. I don't know the specifics. I know we're here 23 today. 24 Q. When did you first learn about any judgments or 25 today. 26 (Attorney Paul Godfread entered the	7	A. That money was used for everyday living	7	Q. Okay. We can set aside Exhibit 5. And by the	
A. Our mortgage, daycare, my personal car payment, food, utilities. I don't know, what everybody spends money on. Q. Is that money all gone? A. There's approximately \$8,000 left in the trust account. Q. At some point did you ever hear how your husband had a judgment against him? A. Yes, I am aware that there is a judgment against my husband. Q. There's a few judgments, is that correct, is that your understanding? A. I don't know the specifics. I know we're here to do when did you first learn about any judgments or 24 A. Wen did you first learn about any judgments or 24 A. Our mortgage, daycare, my personal car payment, food, utilities. MS. MAY: Can you make sure that I get copies of the exhibits? MR. SHEU: Yes. MR. SHEU: My intention is to leave the exhibits that have been marked with the court reporter and have the transcript include all of the exhibits. MS. MAY: Can you make sure that I get copies of the exhibits? MR. SHEU: Yes. MR. SHEU: My intention is to leave the exhibits that have been marked for acopy of the exhibits. MS. MAY: But I won't necessarily be asking for a copy of the exhibits. MR. SHEU: Okay. Can we mark another one. (Browne Deposition Exhibit Number 6 marked for identification.) (Attorney Paul Godfread entered the	8	expenses.	8	way, let me know if you ever need to take a break to go	
food, utilities. I don't know, what everybody spends money on. Q. Is that money all gone? A. There's approximately \$8,000 left in the trust account. Q. At some point did you ever hear how your husband had a judgment against him? A. Yes, I am aware that there is a judgment against my husband. Q. There's a few judgments, is that correct, is that your understanding? A. I don't know the specifics. I know we're here today. Q. When did you first learn about any judgments or 11 copies of the exhibits? MR. SHEU: Yes. MR. SHEU: My intention is to leave the exhibits that have been marked with the court reporter and have the transcript include all of the exhibits. MS. MAY: But I won't necessarily be asking for a copy of the transcript, which is why I'm asking for a copy of the exhibits. MR. SHEU: Okay. Can we mark another one. (Browne Deposition Exhibit Number 6 marked for identification.) Q. When did you first learn about any judgments or 24 (Attorney Paul Godfread entered the	9	Q. What expenses are those?	9	to the bathroom, get a drink of water.	
money on. Q. Is that money all gone? A. There's approximately \$8,000 left in the trust 14 A. There's approximately \$8,000 left in the trust 15 account. Q. At some point did you ever hear how your husband had a judgment against him? A. Yes, I am aware that there is a judgment against my husband. Q. There's a few judgments, is that correct, is 16 Q. There's a few judgments, is that correct, is 17 that your understanding? 28 A. I don't know the specifics. I know we're here 29 today. Q. When did you first learn about any judgments or 10 MR. SHEU: Yes. 11 MS. MAY: Ms. Court Reporter, make sure that that you catch that I asked for copies of the exhibits. MR. SHEU: My intention is to leave the exhibits that have been marked with the court reporter and have the transcript include all of the exhibits. MS. MAY: But I won't necessarily be asking for a copy of the transcript, which is why I'm asking for a copy of the exhibits. MR. SHEU: Yes. MS. MAY: Ms. Court Reporter, make sure that you catch that I asked for copies of the exhibits. MR. SHEU: Okay. Can we mark another one. (Browne Deposition Exhibit Number 6 marked for identification.) (Attorney Paul Godfread entered the	10	A. Our mortgage, daycare, my personal car payment,	10	MS. MAY: Can you make sure that I get	
Q. Is that money all gone? A. There's approximately \$8,000 left in the trust account. Q. At some point did you ever hear how your husband had a judgment against him? A. Yes, I am aware that there is a judgment against my husband. Q. There's a few judgments, is that correct, is that your understanding? A. I don't know the specifics. I know we're here today. Q. When did you first learn about any judgments or 13 MS. MAY: Ms. Court Reporter, make sure that I asked for copies of the exhibits. MR. SHEU: My intention is to leave the exhibits that have been marked with the court reporter and have the transcript include all of the exhibits. MS. MAY: But I won't necessarily be asking for a copy of the transcript, which is why I'm asking for a copy of the exhibits. MR. SHEU: Okay. Can we mark another one. (Browne Deposition Exhibit Number 6 marked for identification.) (Attorney Paul Godfread entered the	11	food, utilities. I don't know, what everybody spends	11	copies of the exhibits?	
A. There's approximately \$8,000 left in the trust account. Q. At some point did you ever hear how your husband had a judgment against him? A. Yes, I am aware that there is a judgment against my husband. Q. There's a few judgments, is that correct, is that your understanding? A. I don't know the specifics. I know we're here today. Q. When did you first learn about any judgments or 14 that you catch that I asked for copies of the exhibits. MR. SHEU: My intention is to leave the exhibits that have been marked with the court reporter and have the transcript include all of the exhibits. MS. MAY: But I won't necessarily be asking for a copy of the transcript, which is why I'm asking for a copy of the exhibits. MR. SHEU: Okay. Can we mark another one. (Browne Deposition Exhibit Number 6 marked for identification.) (Attorney Paul Godfread entered the	12	money on.	12	MR. SHEU: Yes.	
account. Q. At some point did you ever hear how your husband had a judgment against him? A. Yes, I am aware that there is a judgment against my husband. Q. There's a few judgments, is that correct, is that your understanding? A. I don't know the specifics. I know we're here today. Q. When did you first learn about any judgments or MR. SHEU: My intention is to leave the exhibits that have been marked with the court reporter and have the transcript include all of the exhibits. MS. MAY: But I won't necessarily be asking for a copy of the transcript, which is why I'm asking for a copy of the exhibits. MR. SHEU: My intention is to leave the exhibits. MR. SHEU: My intention is to leave the exhibits. MR. SHEU: My intention is to leave the exhibits. MR. SHEU: My intention is to leave the exhibits. MR. SHEU: My intention is to leave the exhibits. MR. SHEU: Okay. Can we mark another one. (Browne Deposition Exhibit Number 6 marked for identification.) (Attorney Paul Godfread entered the	13	Q. Is that money all gone?	13	MS. MAY: Ms. Court Reporter, make sure	
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had a judgment against him? A. Yes, I am aware that there is a judgment against my husband. Q. There's a few judgments, is that correct, is that your understanding? A. I don't know the specifics. I know we're here today. Q. When did you first learn about any judgments or 17 and have the transcript include all of the exhibits. MS. MAY: But I won't necessarily be asking for a copy of the transcript, which is why I'm asking for a copy of the exhibits. MR. SHEU: Okay. Can we mark another one. (Browne Deposition Exhibit Number 6 marked for identification.) (Attorney Paul Godfread entered the	15	account.	15	MR. SHEU: My intention is to leave the	
A. Yes, I am aware that there is a judgment against my husband. Q. There's a few judgments, is that correct, is that your understanding? A. I don't know the specifics. I know we're here today. Q. When did you first learn about any judgments or A. Wes, I am aware that there is a judgment against 18 MS. MAY: But I won't necessarily be asking 19 for a copy of the transcript, which is why I'm asking 20 MR. SHEU: Okay. Can we mark another one. (Browne Deposition Exhibit Number 6 23 marked for identification.) 24 Q. When did you first learn about any judgments or 25 Q. When did you first learn about any judgments or 26 Q. When did you first learn about any judgments or	16	Q. At some point did you ever hear how your husband	16	exhibits that have been marked with the court reporter	
my husband. Q. There's a few judgments, is that correct, is that your understanding? A. I don't know the specifics. I know we're here today. Q. When did you first learn about any judgments or my husband. 19 for a copy of the transcript, which is why I'm asking 20 for a copy of the exhibits. 21 MR. SHEU: Okay. Can we mark another one. (Browne Deposition Exhibit Number 6 marked for identification.) (Attorney Paul Godfread entered the	17	had a judgment against him?	17	and have the transcript include all of the exhibits.	
Q. There's a few judgments, is that correct, is that your understanding? A. I don't know the specifics. I know we're here today. Q. When did you first learn about any judgments or Q. When did you first learn about any judgments or Q. When did you first learn about any judgments or Q. When did you first learn about any judgments or Q. When did you first learn about any judgments or Q. When did you first learn about any judgments or Q. When did you first learn about any judgments or Q. When did you first learn about any judgments or	18	A. Yes, I am aware that there is a judgment against	18	MS. MAY: But I won't necessarily be asking	
that your understanding? 21 MR. SHEU: Okay. Can we mark another one. 22 A. I don't know the specifics. I know we're here 23 today. 24 Q. When did you first learn about any judgments or 25 MR. SHEU: Okay. Can we mark another one. 26 (Browne Deposition Exhibit Number 6 marked for identification.) 27 (Attorney Paul Godfread entered the	19	my husband.	19	for a copy of the transcript, which is why I'm asking	
A. I don't know the specifics. I know we're here 22 (Browne Deposition Exhibit Number 6 23 today. 24 Q. When did you first learn about any judgments or 26 (Attorney Paul Godfread entered the	20	Q. There's a few judgments, is that correct, is	20	for a copy of the exhibits.	
today. 23 marked for identification.) 24 Q. When did you first learn about any judgments or 24 (Attorney Paul Godfread entered the	21	that your understanding?	21	MR. SHEU: Okay. Can we mark another one.	
Q. When did you first learn about any judgments or 24 (Attorney Paul Godfread entered the	22	A. I don't know the specifics. I know we're here	22	(Browne Deposition Exhibit Number 6	
	23	today.	23	marked for identification.)	
25 liabilities that your husband had? 25 deposition room.)	24	Q. When did you first learn about any judgments or	24	(Attorney Paul Godfread entered the	
	25	liabilities that your husband had?	25	deposition room.)	

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	Page 45	720	Page: 12	
	BY MR. SHEU:	1	O. You've never heard of it?	
1	Q. I'm handing you what's been marked Exhibit 6.	1	A. I don't remember.	
2		2		
3	I'm going to ask you to take a look at it, please.	3	Q. How about Alpha Law Firm, have you ever heard of	
4	A. Before we go any farther, I wasn't expecting	4	Alpha Law Firm?	
5	anyone that was not you here and it was my understanding	5	A. I have.	
6	that this was just for this bankruptcy.	6	Q. What do you know about it?	
7	Q. We should make a record. Mr. Godfread has	7	A. It's a law firm.	
8	entered the room. Mr. Godfread is an attorney of record	8	Q. What else do you know about it?	
9	in the bankruptcy, he's noticed his appearance.	9	A. It was run by Paul I believe.	
10	MR. GODFREAD: Do you want me to state	10	Q. Do you know what kind of law he practiced?	
11	anything further on the record? Paul Godfread appearing	11	A. No, I don't know what he practiced with Alpha	
12	both as a creditor and a representative of another	12	Law Firm.	
13	creditor in the bankruptcy proceeding.	13	Q. Do you know what the \$65,970 payment would be	
14	BY MR. SHEU:	14	for?	
15	Q. Okay. And the first page of what's been marked	15	A. No.	
16	Exhibit 6, you'll see at the very top an Alpha Law Firm,	16	Q. I'll have you turn one more page. Do you see a	
17	LLC check made payable to the U.S. Treasury, do you see	17	check written out on July 26, 2010 from Alpha Law Firm	
18	that?	18	to Media Copyright Group, LLC for \$2,000, do you see	
19	A. I do.	19	that?	
20	Q. And it's for \$196,865 on April 16, 2012, do you	20	A. I do.	
21	see that?	21	Q. Are you familiar with Media Copyright Group,	
22	A. Yes.	22	LLC?	
23	Q. Do you know what that was for?	23	A. I am not.	
24	A. I'm not positive.	24	Q. Never heard of it?	
25	Q. Could it have been to pay estimated taxes?	25	A. I don't know if I've heard of it, but I don't	
	Page 46		Page 48	
1	A. That is possible.	1	remember it if I have.	
2	Q. Who handled the taxes in 2012?	2	Q. I'll have you turn ahead a page. There's a	
3	A. It looks like we had someone prepare our taxes,	3	series of checks starting in the middle and going to the	
4	Jackie Borstner prepared our taxes in 2012.	4	bottom, two are from Mr. Hansmeier to Monyet, LLC, do	
5	Q. And you're looking at Exhibit 2?	5	you see that?	
6	A. Yes.	6	A. I do.	
7	Q. Do you know if that payment would have been for	7	Q. Was this basically the funding of the trust we	
8	estimated taxes or for	8	were talking about earlier?	
9	A. I do not know.	9	A. I think so.	
10	Q. Do you remember actually making any checks out	10	Q. The bottom check is for \$2,250 to the law	
11	for taxes yourself or did your husband handle it?	11	offices of Lee McCullough, M-C-C-U-L-L-O-U-G-H, III, PA,	
12	A. I don't remember.	12	do you see that?	
13	Q. I'll have you flip ahead a couple of pages in	13	A. I do.	
14	Exhibit 6 to a check, that's the one dated February 6,	14	Q. Is that the attorney you believe set up the Mill	
15	2013?	15	Trust and Monyet, LLC	
16	MS. MAY: What is Exhibit 6?	16	A. Yes.	
17	MR. SHEU: This was an exhibit in the	17	Q estate plan?	
18	application.	18	A. Yes.	
19	Q. You'll see a February 5th, 2013 check from Alpha	19	Q. Does it make sense that maybe in December of	
20	Law Firm to Class Action Justice Institute for \$65,970,	20	2010 is the time period of when the trust was set up?	
21	do you see that?	21	A. That is possible.	
	A. I do.		Q. Other than the Mill Trust, are you a trustee or	
22	Q. Are you familiar with Class Action Justice	22	beneficiary of any other trust?	
23	Institute?	23	A. I don't know.	
24	A. No.	24	Q. You don't know?	
25	11. 110.	25	Z. TOU GOIL C MIOW:	

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1	A. No, I don't know.	1			
2	Q. You don't know if you are the trustee of any	2			
3	other trust?	3	Q. Did you get a quote for the construction work?		
4	A. You asked a compound question.	4	A. We got individual quotes. Oh, and eventually it		
5	Q. Okay. Do you know if you're the trustee of any	5	will be staged for sale.		
6	other trust?	6	Q. Yeah. Did you, what's the cost of all the		
7	A. No, I don't believe that I am.	7	repair work and fixing up?		
8	Q. Do you know if you're the beneficiary of any	8	A. I don't remember off the top of my head.		
9	A. I do not know.	9	Q. I understand you're going to list it for		
10	Q. Do you guys have a home office?	10	\$950,000, did I hear that correctly?		
11	A. Yes.	11	A. We will have a final decision on that after the		
12	O. At the Carlisle?	12	repair work is done.		
13	A. Yes.	13	Q. Who are you using as a realtor?		
14	Q. Is it like a room, like a segregated room or is	14	A. Ben Ganje.		
15	it a place you rent out?	15	Q. Can you spell that?		
16	A. It's a portion of our bedroom.	16	A. G-A-N-J-E.		
17	Q. Do you pay, you don't pay separate rent on it	17	Q. First name is Ben?		
18	though, it's part of the	18	A. Mm-hmm.		
19	A. It's a home office, as in it's part of our home.	19	Q. Is this an individual or company?		
20	Q. Okay. Now you guys are living somewhere else,	20	A. He's with Lakes Sotheby's.		
21	is that correct?	21	Q. Lake Sotheby's?		
22	A. That is correct.	22	A. Lakes Sotheby's.		
	Q. Where are you living?	23	Q. Lake Sotheby's?		
23	A. 3749 Sunbury Alcove, Woodbury, 55125.	24	A. Lakes, L-A-K-E-S, and then		
24	Q. Are you renting?	25	Q. Sotheby's?		
23	Page 50	23	Page 52		
1	A. We are.	,	A. Yes.		
1 2	Q. Who are you renting from?	1	Q. Do you know when you're going to make a decision		
3	A. An individual person.	3	on the listing price?		
4	Q. Who is the individual person?	4	A. We have not scheduled a final appointment with		
5	A. I don't remember how to spell her name.	5	him yet.		
6	Q. Do you know how to say her name?		Q. Has he told you the range of what you may want		
7	A. Xu Dai maybe.	6	to list it for?		
8	Q. Xu Dai?	8	A. We've heard from 900,000 to 1.3.		
9	A. Yes. It's, I think her first name is X-U, but I	9	Q. Are you familiar with any other recent sales of		
10	don't remember if there's other letters. And I believe	10	comparable apartments, excuse me, condos in your		
11	the last name is D-A-I.	11	building?		
12	Q. What are you paying for rent?	12	A. There aren't very many comparable units in our		
	A. 1,950 a month.		building.		
13	Q. Who's paying the rent, you or the debtor or both	13	Q. So you haven't heard of any sales?		
14	of you?	14	A. No.		
15 16	A. We are paying it jointly as joint tenants to the	16	Q. Now in the petition papers in this case there		
	property.		was an estimated value of \$885,000. Do you believe it's		
17	Q. When did you move into that place?	17	worth more than that?		
18	A. October 5th.	18	A. I'm hoping after the renovations it is, but I		
	Q. Is it a month-to-month lease or a yearly lease?	20	believe that \$885,000 is the number that the county		
20	A. It is a six-month lease.		assessor provided us for our taxes.		
21	Q. And what's, what kind of work are you doing now	21	Q. Are you familiar with the Barry Berg Group?		
22	on the unit 3201 of the Carlisle?	22	Q. Are you familiar with the Barry Berg Group? A. No.		
23	A. We are redoing the floors, replacing the carpet,	23			
24		24			
25	painting, having some plumbing work done, having light	25	it's fixed up and listed?		

Page 53 Page 55 A. As soon as possible. at Exhibit 1 and --Q. Why so quickly? A. I can't look at two things at once. 2 A. So that we can lower our overhead and hopefully MS. MAY: Mr. Sheu, she's not even a fifth 3 pay off the, this stuff. of the way through it. We've all sat here in dead 4 Q. What's this stuff? silence for 20 minutes while she digs through 2,100 5 A. The bankruptcy. pages of documents. Is there a better plan than this? 6 Q. I want to turn your attention back to the Mill 7 MR. SHEU: Why don't we do this. We can 7 Trust and Monyet. Do you know if the Mill Trust is a take a short break while Ms. Browne takes a look at 8 8 revocable trust? Exhibit 1 and puts into piles categories of documents. 9 9 10 A. I have no idea. A. I'm not organizing this for you. 10 Q. It would say so on the trust documents probably? Q. Well, the alternative would be for me to then 11 11 A. Yes. I don't remember. ask you where in the stuff you sent me are the various 12 12 Q. Do you know if there's a spendthrift clause? categories of documents which I've listed by category, 13 13 A. I don't know what that means. tax returns, transfers to you. Monyet, LLC is its own 14 14 Q. And you're representing that there's in the box category, we went through it earlier, and you said you 15 15 of documents you brought today a copy of the Mill Trust? 16 16 either produced it or didn't have it. A. I think there is. MS. MAY: I can tell you that my client is 17 17 18 Q. Okay. 18 not going to be your administrative assistant today. MR. SHEU: Why don't we mark that stack as And I'm going to object to having her sort through your 19 Exhibit 7. documents. 20 20 (Browne Deposition Exhibit Number 7 MR. SHEU: I'm trying to see if the 21 21 marked for identification.) documents are actually produced. This was a subpoena 22 22 Q. I'll have you flip through Exhibit 7 and find for documents. 23 23 the Mill Trust for me. 24 24 MS. MAY: And we have produced them. A. There is over 2,000 pages of documents here. MR. SHEU: And we have yet to see if they 25 25 Page 54 Page 56 Q. Okay. Well, you're telling me it's in there 1 1 somewhere, I didn't see it. MS. MAY: Well, maybe that's because you 2 2 A. Paul and I put it together together, it was my didn't ask for them in advance. You had them delivered 3 understanding this could be in there and I don't know if at the moment the deposition was to start and you left 4 4 it is or not, other than that was my understanding. them out in the hallway for 45 minutes. So it isn't our 5 Q. Okay. I went through the documents and they're fault that you never read or reviewed the documents. 6 6 in --7 And I don't think we should all sit here while you use 7 A. I can spend an hour going through that if you the deponent as a slave to dig through your documents. 8 8 want, but I --MR. SHEU: I went through the documents in Q. Well, I spent 15 minutes going through it. They 15 minutes and I didn't find any Mill Trust documents 10 10 are in no order whatsoever, in fact, they appear to be MS. MAY: And we've offered an alternative 11 11 deliberately out of order. So if there's the Mill Trust to that. We can provide a copy of the Mill Trust 12 12 in there. I'd love to find it. document. I think I have it in my office, he has it in 13 13 MR. HANSMEIER: Mr. Sheu, rather than have his office. If it isn't in there, we can certainly 14 14 my wife page through 2,000 pages of documents, I'd be provide it. But this appears just to be petty and 15 15 glad when I go back to my office to send you a copy to punishment and I want that on the record. 16 16 your personal email, a copy of that. So regardless of MR. SHEU: I want it on the record that 17 17 whether you can find it or not right now, you'll have it this is the most bad faith production of documents I 18 18 have ever seen. They are not in any order, and in fact, 19 19 MR. SHEU: Well, I'm taking her deposition, they are deliberately out of order, they're upside down. 20 20 I don't want to ask, be asking you questions at the same 21 A. I didn't see a single page upside down as of 21 22 yet. 22 Q. That's because I put them in the right order A. Do you mind if I take out portions after I look 23 23 through them? when I reviewed them before the deposition started, at 24 24 Q. Please do. In fact, if you want to take a look least most of them. 25

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1	MR. HANSMEIER: Mr. Sheu, I'll reiterate my	1	MR. SHEU: Okay. We'll go off the record			
1 2	request for my offer to go to my office and grab you a	2	and we'll come back at 11:30.			
3	copy of it. I believe you just missed it when you went	3	(Short break taken at 10:52 a.m.)			
4	through the documents. I don't think you can	4	BY MR. SHEU:			
5	realistically go through 2,000 pages of documents in	5	Q. Ms. Browne, the debtor on his schedules in this			
6	15 minutes. But we can isolate the document for you,	6	case listed some business rent of \$2,173 a month. Do			
7	you can have it very shortly and we can stop this	7	you know if your husband rents out space for his, for			
8	charade of forcing my wife to page by page through 2,100	8	his business?			
9	documents when you have a good faith legitimate	9	A. I think so.			
10	alternative before you.	10	Q. Do you know where it is located at?			
11	MR. SHEU: We can adjourn the deposition	11	A. I'm not sure.			
12	and reconvene it after I have it.	12	Q. You don't know where your husband works?			
13	MR. HANSMEIER: Sure, that's not a problem.	13	A. I know he has an office downtown.			
14	MS. MAY: I know we have also produced it	14	Q. You don't know where?			
15	to the Chapter 13 trustee.	15	A. That's correct.			
16	A. And it's actually not on the subpoena. It says	16	Q. Have you ever been to his place of work?			
17	Monyet, but not Mill Trust on your subpoena, so.	17	A. Yes.			
18	MR. HANSMEIER: Why don't we adjourn.	18	Q. Where is it?			
19	MR. SHEU: We're not adjourning, this is my	19	A. It's downtown.			
20	deposition.	20	Q. Where downtown?			
21	MR. HANSMEIER: You just said.	21	A. In one of the buildings down here.			
22	MR. SHEU: I'd like to see if it's in there	22	Q. Which building?			
23	before we adjourn.	23	A. I don't know the name.			
24	MS. MAY: Okay. Well, pass it back over to	24	Q. What's the address?			
25	him and let him go through it, you're done.	25	A. I don't know the address.			
	Page 58		Page 60			
1	A. Here you go. And this is what I've looked	1	Q. Is it the Fifth Street Towers?			
2	through so far.	2	A. I have been to the Fifth Street Towers, I do not			
3	MR. SHEU: Okay. I'm just going to make a	3	believe that is where his physical office is.			
4	record that the box of documents that was produced today	4	Q. Do you know what the building looks like?			
5	is in no discernible order and there apparently is no	5	A. It's tall and white or silver or something.			
6	Mill Trust record in it.	6	Q. Now you have a car payment?			
7	A. You can't actually say that since you haven't	7	A. I do.			
8	actually looked through all 2,000 pages.	8	Q. What is your monthly car payment?			
9	Q. Okay. Well, I have looked through all 2,000	9	A. Approximately 830 something I think.			
10	pages. There's duplicates in there, there's two sets of	10	Q. How much do you have left on it to pay off?			
11	Alpha Law Firm bank records at TCF, two duplicate sets.	11	A. I'm not sure.			
12	There's no Mill Trust anywhere in there.	12	Q. When did you buy it?			
13	MR. SHEU: So if you have it and you're	13	A. July 2012.			
14	going to produce it, great, we can adjourn the	14	Q. Was it bought new?			
15	deposition and reconvene after you've produced it. If	15	A. Yes.			
16	you want to do that this afternoon, that's fine.	16	Q. Do you know what the total purchase price was?			
17	MS. MAY: Or if you want to dig through	17	A. I do not remember.			
18	there and find it, that's fine.	18	Q. What kind of car is it?			
19	MR. HANSMEIER: Mr. Sheu, my office is ten	19	A. An Audi Q7.			
20	minutes away, I can walk over there, print off the	20	Q. Is it the family car?			
21	document and bring it back.	21	A. Yes.			
22	MR. SHEU: It's quarter to 11 now. Why	22	Q. Do you guys have any other vehicles?			
23	don't you do that, we'll reconvene at 11:30.	23	A. We just started leasing another car.			
24	MS. MAY: It's ten to 11:00.	24	Q. What car is that?			
25	MR. HANSMEIER: No problem.	25	A. It is a Toyota Prius.			

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	Page 61		Page 63
1	Q. When did you start leasing it?	1	Q. Is that at Stonebridge?
2	A. October 5th or 4th.	2	A. There's one at Associated and one at
3	Q. Of this year?	3	Stonebridge.
4	A. Or 3rd, whatever, that weekend. Right before we	4	Q. And those are sort of nominal amounts of money
5	moved because we need two cars now.	5	in them?
6	Q. And who drives the Prius?	6	A. The Stonebridge account has a nominal amount in
7	A. It depends on the day.	7	it.
8	Q. So you guys both drive both cars?	8	Q. And the Associated one does as well?
9	A. Yes.	9	A. I'm not sure what it has in it currently.
10	Q. How much is the lease on the Prius?	10	Q. Less than a thousand dollars?
11	A. I, I don't remember.	11	A. I'm not sure.
12	Q. You don't remember 20 days ago?	12	Q. And what credit cards do you have, either you
13	A. No. I can give you a ballpark, but that's it.	13	personally or you with your husband?
14	Q. Yeah, what's your ballpark?	14	A. I have a Citi card, a Chase, Capital One,
15	A. Under 300.	15	Target, Bank of America, Banana Republic, maybe some, I
16	Q. Under 300, is that correct?	16	don't know, Loft, did I say that.
17	A. Yes.	17	Q. Have you engaged the real estate broker you
18	Q. Where are you leasing it from?	18	talked about earlier, Ben Ganje of Lakes Sotheby's, do
19	A. A Toyota dealership.	19	you have a listing agreement or a broker agreement with
20	Q. Are you signatory on the lease?	20	him?
21	A. I am.	21	A. We do.
22	Q. Is your husband as well?	22	Q. When did you enter into that agreement?
23	A. No.	23	A. Either in September or October of this year.
24	Q. Do you pay the lease payments?	24	Q. When did you decide to sell the condo?
25	A. I will be.	25	A. At around the time we entered the agreement.
	Page 62		Page 64
1	Q. Are you the one responsible for the mortgage	1	Q. September or October of this year?
2	payments at the condo, at the Carlisle?	2	A. Mm-hmm.
3	A. I don't understand what you mean by responsible.	3	Q. Do you have any expenses that are not household
4	Q. Do you pay, are you the one that	4	expenses, like just your own personal ones that you have
5	A. It comes out of my personal checking account.	5	to pay out of your separate accounts?
6	Q. Is that true for the rent you're paying at the	6	A. I don't understand.
7	house in Woodbury as well?	7	Q. Do you have any expenses you have to pay, bills
8	A. So far it has, but we paid once, so.	8	and so forth that are not joint household bills?
9	Q. So you're paying the Carlisle mortgage payments	9	A. Well, the car is mine.
10	and the rent payments in Woodbury, is that correct?	10	Q. Okay, so car.
11	A. That's what's coming out of my personal bank	11	A. If I buy clothes I pay for them myself.
12	account, yes.	12	Q. Do you still have student loans?
13	Q. At Associated Bank?	13	A. No.
14	A. Yes.	14	Q. When were they paid off?
15	Q. How about the other household expenses like	15	A. I don't remember exactly.
16	daycare and so forth, does that come out of your	16	Q. Other than the Mill Trust which as soon as the
17	personal bank account?	17	copy comes back we'll take a look at, are there any
18	A. It does.	18	other entities, corporate entities that you have an
19	Q. Do all the household expenses come out of your	19	interest in or an involvement in?
20	personal bank account?	20	A. I don't think so.
21	A. Currently, yes.	21	Q. You've never signed an LLC agreement other than
22	Q. Do any come out of your husband's bank accounts?	22	as trustee of the Monyet?
23	A. I don't know. I don't know that he has any.	23	A. Not that I remember.
24	Q. Any bank accounts?	24	Q. So you were never a member of Guava, LLC?
25	A. I know he has a joint bank account with me.	25	A. That's correct.

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	Page 65		Page 67	
1	Q. How about AF Holdings, LLC?	1	or indirectly other than the \$8,000 that's in the Monyet	
2	A. I was not a member of AF Holdings.	2	trust?	
3	Q. Do you know who was?	3	A. There's money in various accounts as reflected	
4	A. No.	4	in the papers that I provided you.	
5	Q. How about Guava?	5	Q. So all the papers that you provided, which we'll	
6	A. No.	6	get back in a second, reflect the world of your net	
7	Q. How about Ingenuity 13?	7	worth?	
8	A. I do not know and I was not a member.	8	A. Yeah, that and the condo, yep.	
9	Q. How about Livewire Holdings?	9	Q. Okay.	
10	A. I do not know and I was not a member.	10	MR. SHEU: Why don't we take a break while	
11	Q. How about Media Copyright Group?	11	we wait for the documents, I'll go check on them.	
12	A. I do not know and I was not a member.	12	(Short break taken at 11:39 a.m.)	
13	Q. How about Prenda Law, Inc.?	13	(Browne Deposition Exhibit Number 8	
14	A. I do not know and I was not a member.	14	marked for identification.)	
	Q. Do you know if your husband was a member of any	15	BY MR. SHEU:	
15	of those entities I just mentioned?		Q. Ms. Browne, I'm going to hand you back	
16	A. It is my understanding that he is not, or was	16	Exhibit 7. And I'm not going to ask you to do much with	
17		17	it other than just let me know if Exhibit 7 accurately	
18	not.	18		
19	Q. Is not or was not? A. Correct.	19	is what you guys produced to me today?	
20		20	A. I can't do that because I didn't see it being	
21	Q. Was not as well as is not?	21	copied, so I don't know. I mean, you're the only person	
22	A. Well, I don't know if they currently exist, but	22	that can tell me if it's an accurate copy of what we	
23	it's my understanding that he is not now and has never	23	provided for you.	
24	been a member of the ones that you listed, but I could .	24	Q. Okay. Well, assuming I accurately copied it, is	
25	be wrong.	25	what you've provided today the world of documents that	
	Page 66			
			Page 68	
1	Q. So it sounds like you've heard of those entities	1		
1 2		1 2		
	Q. So it sounds like you've heard of those entities		you could find responsive to the subpoena?	
2	Q. So it sounds like you've heard of those entities that I just mentioned?	2	you could find responsive to the subpoena? A. Yes.	
2	Q. So it sounds like you've heard of those entities that I just mentioned? A. I've heard of Prenda because it's in the news.	2	you could find responsive to the subpoena? A. Yes. Q. Okay. Now I'm going to hand you what's been	
2 3 4	Q. So it sounds like you've heard of those entities that I just mentioned? A. I've heard of Prenda because it's in the news. Q. What about Livewire Holdings?	2 3 4	you could find responsive to the subpoena? A. Yes. Q. Okay. Now I'm going to hand you what's been marked Exhibit 8 and ask you if you can identify it for	
2 3 4 5	Q. So it sounds like you've heard of those entities that I just mentioned? A. I've heard of Prenda because it's in the news. Q. What about Livewire Holdings? A. I have heard of it once or twice before, don't	2 3 4 5	you could find responsive to the subpoena? A. Yes. Q. Okay. Now I'm going to hand you what's been marked Exhibit 8 and ask you if you can identify it for me?	
2 3 4 5 6	Q. So it sounds like you've heard of those entities that I just mentioned? A. I've heard of Prenda because it's in the news. Q. What about Livewire Holdings? A. I have heard of it once or twice before, don't know what it does.	2 3 4 5	you could find responsive to the subpoena? A. Yes. Q. Okay. Now I'm going to hand you what's been marked Exhibit 8 and ask you if you can identify it for me? A. It is a copy of the Mill Trust.	
2 3 4 5 6 7	Q. So it sounds like you've heard of those entities that I just mentioned? A. I've heard of Prenda because it's in the news. Q. What about Livewire Holdings? A. I have heard of it once or twice before, don't know what it does. Q. Where did you hear about it?	2 3 4 5 6 7	you could find responsive to the subpoena? A. Yes. Q. Okay. Now I'm going to hand you what's been marked Exhibit 8 and ask you if you can identify it for me? A. It is a copy of the Mill Trust. Q. And is this the Mill Trust that you provided to	
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Page 69 Page 71 A. I don't remember. A. I don't remember. I'd have to read through it O. Is it fair that your husband knows more about 2 2 again. this trust than you? O. Okav. A. I don't know. MR. SHEU: Well, at this point I'm going to 4 4 O. Okav. He testified previously that you would adjourn my questioning with the reservation that I get 5 5 know more about this than he would? to fully review Exhibit 7, what was produced today, and 6 6 A. I don't know what he testified to previously. reserve the right to reconvene. I'll ask if Mr. 7 7 Q. Okay. He also testified that after one day of a Godfread has any questions that he would want to ask? 8 8 debtor's exam he came back for another day and said that MR. GODFREAD: No, not at this time. 9 9 he had spoken to you and that you had reminded him about MS. MAY: I have nothing. 10 10 wills and trusts. Do you remember speaking to him about BY MR. SHEU: 11 11 wills and trusts? Q. Okay. Thank you for your time. 12 12 A. I don't, no. I don't even know when the debtor A. Thanks. 13 13 exam happened, so I have no idea what happened around (Proceedings adjourned at 11:50 a.m.) 14 14 that time. 15 15 Q. Okay. It was in June and July of 2014? 16 16 17 A. I don't remember what we talked about in June or 17 18 July of 2014. 18 ${\tt Q.}\,\,$ Of all the people in the world who would know 19 19 the most about the Mill Trust, this Exhibit 8, who would 20 20 21 that he? 21 A. I don't know. 22 22 23 You don't know? 23 That's correct. 24 24 Do you know today why it's set up? 25 25 Page 72 Page 70 REPORTER'S CERTIFICATE It was set up for trust and estate planning. 1 1 What do you mean by trust and estate planning? 2 2 I mean trust and estate planning. 3 3 STATE OF MINNESOTA What does that mean? 4 4 COUNTY OF WASHINGTON) I don't know. 5 I hereby certify that I reported the deposition of Padraigin Browne on the 28th day of October 2015, in Minneapolis, Minnesota, and that the witness was by me first duly sworn to tell the whole truth; You don't know? 6 6 I don't know other than what it says in here. 7 7 Did you draft this document? 8 8 That the testimony was transcribed by me and is a true record of the testimony of the witness; 9 I did not. That the cost of the original has been charged to the party who noticed the deposition, and that all parties who ordered copies have been charged at the same You did sign the document? 10 10 11 That's correct. rate for such copies; 12 You must have read it before you signed it? 12 That I am not a relative or employee or attorney or counsel of any of the parties, or a relative or employee of such attorney or counsel; I did. back in 2010. 13 13 Has there been any amendments to this trust? 14 14 That I am not financially interested in the action and have no contract with the parties, attorneys, or persons with an interest in the action that affects o has a substantial tendency to affect my impartiality; Not that I'm aware of. 15 15 Have you signed any other documents relating to Ο. 16 16 this Mill Trust? That the right to read and sign the deposition by 17 17 the witness was waived. I have not signed any amendments to the Mill 18 18 WITNESS MY HAND AND SEAL THIS 28th day of October 2015. Trust. 19 19 Has the Mill Trust filed its own tax returns? 20 20 No, it's a trust. 21 21 Gelley E. Filles So it must be a revocable trust? 2.2 22 I don't know, you'd have to read the document. 23 23 Kelley E. Zilles, RPR Notary Public, Washington County, Minnesota My commission expires 1-31-2020 In other words, could you guys revoke that right 24 24 now if you want to? 25 25